

**AIR NATIONAL  
GUARD**

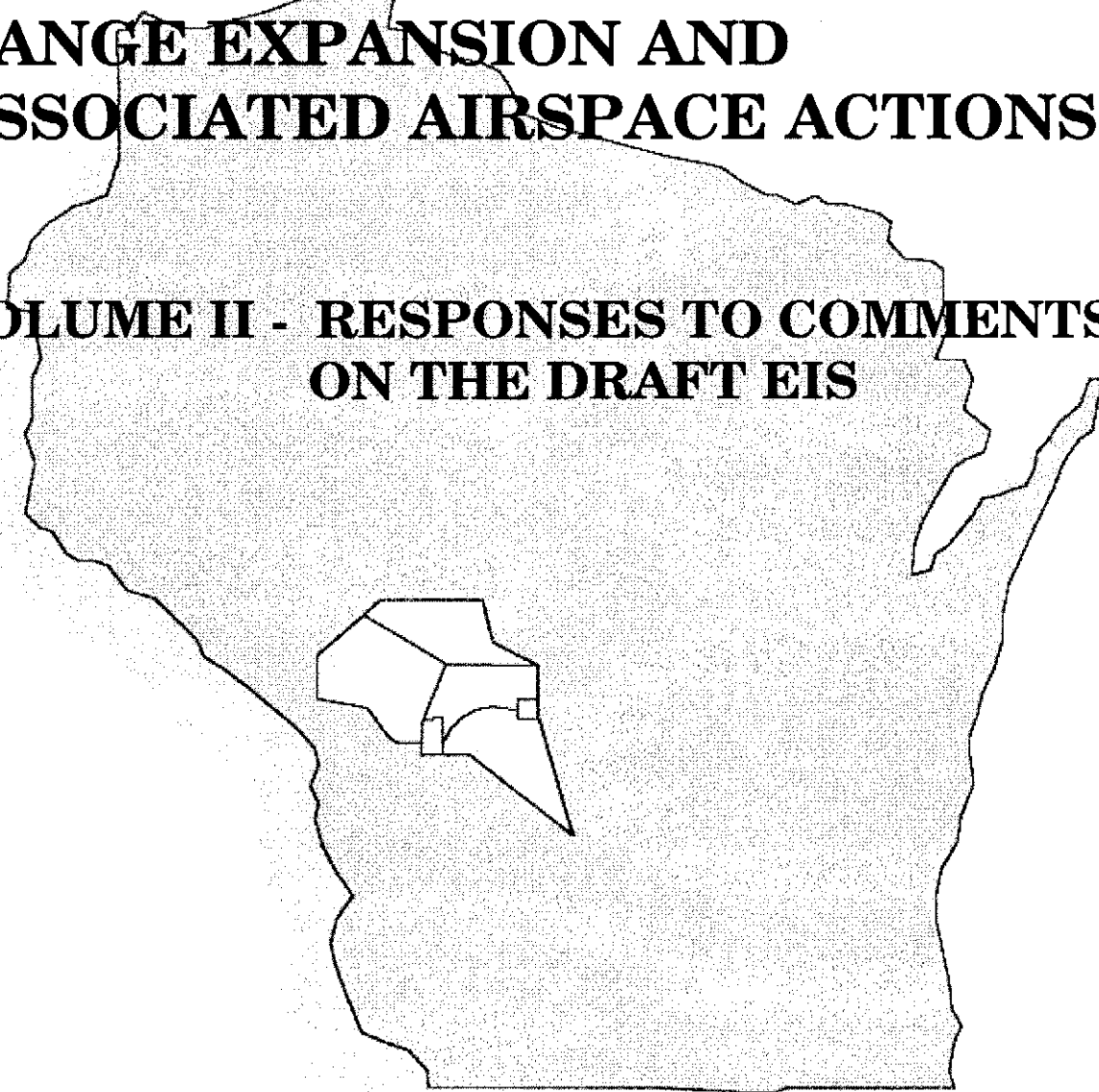
**NATIONAL GUARD  
BUREAU**

---

**FINAL ENVIRONMENTAL  
IMPACT STATEMENT  
ADDRESSING THE HARDWOOD  
RANGE EXPANSION AND  
ASSOCIATED AIRSPACE ACTIONS**

**VOLUME II - RESPONSES TO COMMENTS  
ON THE DRAFT EIS**

**MARCH 2000**



# FINAL ENVIRONMENTAL IMPACT STATEMENT ADDRESSING THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

## VOLUME II – RESPONSES TO COMMENTS ON THE DRAFT EIS

Air National Guard  
National Guard Bureau  
Andrews Air Force Base, Maryland

November 1998



*This document is printed on recycled paper.*

# *Index of Comments*

<i>Location</i>	<i>Date of Comment</i>	<i>Name</i>	<i>Page</i>
-----------------	------------------------	-------------	-------------

## **Public Hearing at Mauston, WI**

### *Verbal Comment*

9/16/97	Kevin	Greengrass	5
9/16/97	Edie	Ehlert	8
9/16/97	Marilyn	Leys	13
9/16/97	Dave	Siebert	18
9/16/97	Curtis	Pluke	21
10/16/97	Patricia	Conway	25
9/16/97	John	Hamm	30
9/16/97	Dick	Smith	32
9/16/97	Dawn	Ramer	38
9/16/97	Victoria	Brzezinski	41
9/16/97	Curtis	Pluke	43
9/16/97	Dick	Smith	46
9/16/97	Tom	Reis	52
9/16/97	Curtis	Pluke	54

### *Written Comment*

9/16/97	Robert	Funmaker	57
9/16/97	Bruce	Miller	58

## **Public Hearing at Black River Falls, WI**

### *Verbal Comment*

9/17/97	Jane	Lewis	68
9/17/97	Jenny	Frost	71
9/17/97	Pauline	Evans	73
9/17/97	Susan	Ripple	74
9/17/97	Tom	Lovejoy	78
9/17/97	Patricia	Conway	80
9/17/97	Jay Dee	Nichols	85
9/17/97	Dick	Smith	86
9/17/97	Jim	Lewis	91
9/17/97	Patricia	Conway	93
9/17/97	Dick	Smith	98
9/17/97	Jim	Lewis	101
9/17/97	Steve	Firkins	102

<i>Location</i>	<i>Date of Comment</i>	<i>Name</i>	<i>Page</i>
-----------------	------------------------	-------------	-------------

<i>Written Comment</i>	9/17/97	Troy	Frost	106
------------------------	---------	------	-------	-----

	9/17/97	Brian	Jensen	110
--	---------	-------	--------	-----

	9/17/97	Donald	Krohn	111
--	---------	--------	-------	-----

## Public Hearing at Wisconsin Rapids, WI

### *Verbal Comment*

	9/18/97	Louise	Rosandick	119
--	---------	--------	-----------	-----

	9/18/97	Terry	McKnight	123
--	---------	-------	----------	-----

	9/18/97	Amos	Miller	126
--	---------	------	--------	-----

	9/18/97	Mary	Jocham	132
--	---------	------	--------	-----

	9/18/97	Bill	Buckley	136
--	---------	------	---------	-----

	9/18/97	Mary	Brown	140
--	---------	------	-------	-----

	9/18/97	Jwanita	Martinson	143
--	---------	---------	-----------	-----

	9/18/97	Ellen	Allan	146
--	---------	-------	-------	-----

	9/18/97	Troy	Brey	149
--	---------	------	------	-----

	9/18/97	Tom	Lochner	151
--	---------	-----	---------	-----

	9/18/97	Daniel	Joling	157
--	---------	--------	--------	-----

	9/18/97	Harold	Gaier	161
--	---------	--------	-------	-----

	9/18/97	Walter	Embke	165
--	---------	--------	-------	-----

	9/18/97	Lois	McMahon	165
--	---------	------	---------	-----

	9/18/97	Pat	Conway	166
--	---------	-----	--------	-----

	9/18/97	Sue	Silvermarie	171
--	---------	-----	-------------	-----

	9/18/97	David	Schmick	174
--	---------	-------	---------	-----

	9/18/97	Mike	Wipfli	177
--	---------	------	--------	-----

	9/18/97	Dale	Gray	179
--	---------	------	------	-----

	9/18/97	Dave	Draves	185
--	---------	------	--------	-----

	9/18/97	Dale	Peterson	190
--	---------	------	----------	-----

	9/18/97	Richard	Skifton	192
--	---------	---------	---------	-----

	9/18/97	Steve	Schwanebeck	197
--	---------	-------	-------------	-----

	9/18/97	Dick	Smith	199
--	---------	------	-------	-----

	9/18/97	Leo	Engel	207
--	---------	-----	-------	-----

	9/18/97	Robert	Engel	209
--	---------	--------	-------	-----

	9/18/97	Troy	Brey	210
--	---------	------	------	-----

	9/18/97	Richard	Kautz	211
--	---------	---------	-------	-----

	9/18/97	Gary	Brey	213
--	---------	------	------	-----

	9/18/97	Clark	Snyder	213
--	---------	-------	--------	-----

	9/18/97	Clare	Searles	214
--	---------	-------	---------	-----

	9/18/97	Charlotte	Searles	215
--	---------	-----------	---------	-----



<i>Location</i>	<i>Date of Comment</i>	<i>Name</i>		<i>Page</i>
	9/18/97	Violet	Prihoda	217
	9/18/97	David	Janssen	219
	9/18/97	Gary	Vanatta	221
	9/18/97	Michael	Speich	222
	9/18/97	Lynn	Young	223
<i>Written Comment</i>				
	9/18/97	Morris	Brockman	226
	9/18/97	Henry	Bruse	227
	9/18/97	Steve	Grant	228
	9/18/97	Kurt	Gross	229
	9/18/97	Floyd	Hohenstein	230
	9/18/97	Wayne	King	234
	9/18/97	John	Schaller	236
	9/18/97	Tom	Weiler	237

	<i>Date of Comment</i>	<i>Name</i>	<i>Page</i>
<b>LETTERS</b>			
<i>Government Letters</i>			
	9/30/97	Richard Daniels City of Marshfield	239
	10/1/97	Sherman Banker State Historical Society of Wisconsin	242
	10/21/97	Gordon Stargardt Wood County Board of Supervisors	244
	10/22/97	Michael MacMullen U.S. Environmental Protection Agency Region 5	259
	11/5/97	Hugh O'Donnell Port Edwards Board of Supervisors	261
	11/13/97	Joseph Rusch Clerk, City of Nekoosa	262
	11/17/97	Michelle Behm Airspace Branch, Federal Aviation Administration	263
	11/19/97	Russell D. Feingold Herb Kohl United States Senators	266
	11/20/97	Gary Brownell Attorney General, Ho-Chunk Nation Department of Justice	270
	11/20/97	Don Henne U.S. Department of the Interior	281
	11/20/97	George Meyer State of Wisconsin, Department of Natural Resources	291
<i>Other Letters</i>			
	8/29/97	Anonymous	355
	9/11/97	Brenda Erickson	356
	9/18/97	Pat Conway	357
	9/19/97	Dale & Patricia Gray	365
	9/20/97	Robert & Lois McMahon	366
	9/22/97	Troy Brey	367
	9/25/97	Larry Francis	374
	9/25/97	Amos Miller	375
	9/26/97	Martin Henert	380
	9/26/97	Eleanor McLillan	381
	9/29/97	Gilbert Raddatz	382
	10/2/97	Barb Fleisner	383
	10/4/97	Maggie Jones	385
	10/6/97	Mark Giese	387
	10/7/97	Marilyn Leys	388
	10/7/97	Don Timmerman	395

<i>Date of Comment</i>	<i>Name</i>	<i>Page</i>
10/8/97	Dale & Patricia Gray	396
10/9/97	Scott Molle	398
10/11/97	Judith Larsen	399
10/13/97	Ken & Lin Kenworthy	400
10/13/97	Daniel Smallbrook	401
10/15/97	Steven Knorr	402
10/15/97	Bruce Trimble	403
10/16/97	Timothy Gapen	404
10/16/97	Nelson Moffat	405
10/17/97	Dennis & Jean Flathorn	406
10/19/97	Glenn Donovan	407
10/19/97	Edie Ehlert	408
10/20/97	George Carlson	414
10/20/97	Ed Emerson	415
10/20/97	Christine Goodness	416
10/20/97	Gerald Redmond	417
10/20/97	Jack & Marge Schenk	418
10/21/97	Larry & Pamela Hilendorf	419
10/21/97	Tony & Joyce Jaromin	420
10/22/97	Thomas Judge	421
10/22/97	John Knolinski	423
10/22/97	John & Pamela Knolinski	424
10/22/97	Thomas & Viola Ruesch	425
10/23/97	Jim Ginter	426
10/23/97	Daniel & Donna Golueke	427
10/23/97	Dale & Patricia Gray	431
10/23/97	Donald Litzer	433
10/23/97	Steven Meis	434
10/23/97	Darrel & Linda Roder	435
10/24/97	Dave & Marge Brockman	436
10/24/97	Willard & Shirley Kussman	437
10/24/97	William & Carol Schultz	438
10/24/97	William Sell	439
10/24/97	Keith Wright	440
10/25/97	Ruth Arendt	441
10/25/97	Howard Rand	442
10/25/97	John Thompson	444

<i>Date of Comment</i>	<i>Name</i>	<i>Page</i>
10/26/97	Len Purvis	445
10/27/97	Francis Daly	446
10/27/97	Robert DeVita	447
10/27/97	Carol Rand	448
10/28/97	Philip Haasl	450
10/28/97	Harvey & Karen Kandler	451
10/28/97	Vern Nelson	452
10/29/97	Lee Breezee	453
10/29/97	Karen Skerven	454
10/30/97	Rodney Brockman	455
10/31/97	Donald Randecker	456
11/1/97	Victor Reigel	457
11/2/97	Morris Brockman	458
11/2/97	Yvonne Brockman	459
11/2/97	Rea Kirk	460
11/2/97	Patricia Witt	461
11/4/97	Paul Field	462
11/4/97	Georgette Frazer	463
11/4/97	David Ginter	464
11/4/97	John Haefner	467
11/4/97	David Johnson	468
11/4/97	Edward Lotzer	469
11/4/97	Daniel Peterson	470
11/4/97	Kenneth Schwab	471
11/4/97	Beverly Schraeder	472
11/5/97	Doug Furnier	473
11/5/97	Mary Richards	474
11/6/97	Ellen Allan	475
11/6/97	Bruce Barrett	476
11/6/97	William Demmerly	477
11/6/97	David Krekowski	479
11/6/97	Jan Krekowski	480
11/6/97	Richard LaMartina	481
11/6/97	Sue Presser	482
11/6/97	Orin Toltzman	484
11/7/97	Robert Koszarek	485
11/10/97	Gary Fehrman	486
11/10/97	Guy Gottschalk	487
11/10/97	Debra McNutt	488
11/10/97	Carlotta Ullmer	489

<i>Date of Comment</i>	<i>Name</i>	<i>Page</i>
11/12/97	Patricia Buchler	490
11/12/97	G.R. Detlefsen	491
11/12/97	Daniel Maurer	492
11/12/97	Phillip Stefonik	493
11/12/97	John Wigand	494
11/13/97	Susan Borri	495
11/13/97	Esty Dinur	496
11/13/97	Patricia Knower	497
11/13/97	Georgia Mommaerts	498
11/13/97	Nicholas Noll	499
11/13/97	Sandra Trochinski	500
11/14/97	Robert Engel	501
11/14/97	Barbara Hoffman	503
11/14/97	Harlan Ledding	504
11/15/97	Don Allen	505
11/15/97	Joan Allen	506
11/15/97	Jean Doty	507
11/15/97	Carol Richter	508
11/15/97	Susan Ripple	509
11/15/97	Ken Stark	517
11/16/97	Heidi Gross	518
11/16/97	Donald Hoffman	519
11/16/97	Robert & Lois McMahon	521
11/16/97	Linda O'Donnell	522
11/17/97	Ben Behn	524
11/17/97	Timothy Coursen	525
11/17/97	Stephen Ertz	526
11/17/97	Pauline Evans	527
11/17/97	Bill Kaberle	533
11/17/97	Kris Kaberle	534
11/17/97	Clare & Charlotte Searles	535
11/17/98	Judith Wilmes	536
11/17/97	Judith Wilmes	540
11/18/97	Karen Banaszak	543
11/18/97	Benedict Benkowski	544
11/18/97	Emma Czarapata	545

<i>Date of Comment</i>	<i>Name</i>	<i>Page</i>
11/18/97	Lori DeGayner	546
11/18/97	Floyd Hohenstein	547
11/18/97	Linda O'Donnell	548
11/18/97	Tim O'Donnell	549
11/18/97	Clement & LaVonne Ruesch	550
11/18/97	Judith Wilmes	551
11/19/97	Francis Gallagher	554
11/19/97	Bill Kaberle	555
11/19/97	Merlin & Kathryn Leschinsky	556
11/19/97	Timothy Otto	557
11/19/97	Marty Wendt	561
11/19/97	William Wolf	562
11/20/97	Larry Clark	565
11/20/97	Alfred Johnson	566
11/20/97	Keith & Doris LaPalma	567
11/21/97	Mary Brazeau Brown	568
11/21/97	Tom Herschelman	570
11/21/97	Peg LaMartina	593
11/21/97	Tom Lochner	594
11/21/97	Ralph Plantikow	596
11/21/97	Barb Schieffer	597
11/21/97	Andrew & Mariam Simons	599
11/21/97	Elanor Wargowsky	600

**PUBLIC COMMENTS  
RECEIVED AT THE PUBLIC HEARINGS**

---

---

**COMMENTS FROM PUBLIC MEETING HELD IN  
MAUSTON, WISCONSIN, SEPTEMBER 16, 1997**



1 AIR NATIONAL GUARD : JUNEAU COUNTY

2

3 Proposed Hardwood Range Expansion  
4 and Related Airspace Actions  
5 Draft Environmental Impact Statement meeting

6

7

8

9

9 MODERATOR: Elmer Simonson

10 DATE: September 16, 1997

11 TIME: 7:00 p.m. to 8:32 p.m.

12 LOCATION: Mauston High School  
13 508 Grayside Avenue  
14 Mauston, WI 53948

15

16

17

18

19

20 \* \* \*

21

22

23

24

25

1 THE MODERATOR: Good evening, ladies  
2 and gentlemen. I would like to get started.  
3 To begin with, I would like to thank you for  
4 your participating in tonight's meeting for the  
5 proposed Hardwood Range Expansion and Related  
6 Airspace Actions Draft Environmental Impact  
7 Statement. This meeting is part of the  
8 National Environmental Policy Act process. The  
9 purpose here is to seek your comments on the  
10 Draft Environmental Impact Statement for the  
11 proposed Hardwood Range Expansion and  
12 Associated Airspace Actions.

13 My name is Elmer Simonson. I am your  
14 neutral moderator this evening. My goal  
15 tonight is to ensure that each and every one of  
16 you has the opportunity to comment in a fair  
17 manner. To accomplish this, I ask you to  
18 please comply with a few ground rules.

19 First of all, you were given the  
20 opportunity to sign up to comment when you  
21 registered. I will call for comments from the  
22 sign up list. If you did not previously sign  
23 up but you would like to sign up now, please  
24 raise your hand and you will be given a card to  
25 do so. If, at any time, you would like to sign

1 up to comment this evening, the sign up cards  
2 will be located in the back of the room.

3 Each person wishing to comment will be  
4 given five minutes to do so. I ask that you  
5 confine your comments to that time frame. When  
6 you have one minute left of your allotted time,  
7 I will signal you that your time is almost  
8 finished. At the end of the five minutes, I  
9 will then ask you to complete your comment.

10 Please be aware, however, that you also  
11 have the opportunity to write your comments on  
12 a blank written form, such as this one here, or  
13 to submit a prepared statement to me or to send  
14 that statement to the mailing address, or you  
15 may go over into the next room and, just  
16 across, the first room, there is a court  
17 reporter located there that you can give your  
18 comments to.

19 After everyone has commented, if time  
20 is available, those wishing to make additional  
21 comments will be allowed to do so.

22 I ask that there be no interruptions  
23 during the comments. It is only fair to you  
24 and to the representatives from the Air  
25 National Guard that each person have the

1 opportunity to complete their statements  
2 without interruption.

3 Our schedule this evening is as  
4 follows: after I complete my remarks, a  
5 videotape outlining the proposals will be  
6 played. This tape is approximately nine  
7 minutes long, and then after that I will call  
8 for comments.

9 A couple of introductions I would like  
10 to make, the commander of Volk Field, General  
11 McMurray. Also, the transcript of tonight's  
12 meeting is being recorded in this room by Amy  
13 Downs, a court reporter from Grossbier &  
14 Associates in Wisconsin Rapids, and as I  
15 mentioned, there is a court reporter across the  
16 hall, and her name is June Bongors and she's a  
17 court reporter with the same firm out of  
18 Wisconsin Rapids as well. They are available  
19 to take your comments.

20 During the formal comment session the  
21 court reporter may ask that you repeat  
22 information. Please assist the court reporter  
23 in doing that when asked so that the Air  
24 National Guard can have an accurate transcript  
25 of tonight's meeting.

1           It is our plan to adjourn this evening  
2           at approximately 9:00 p.m. At this time we'll  
3           view the brief videotape outlining the  
4           proposals.

5  
6           (Videotape played.)

7  
8           THE MODERATOR: Okay. It is now time  
9           for the official comment portion of the  
10          meeting. Just prior to that, though, I would  
11          like to introduce any of our elected officials  
12          joining us here tonight. The card I have is  
13          from Kevin Greengrass. Is Kevin here?

14          KEVIN GREENGRASS: Yes, I am.

15          THE MODERATOR: Okay. Do you wish to  
16          make a comment at this time?

17          KEVIN GREENGRASS: Sure.

18          THE MODERATOR: I would ask if you  
19          could state your name and address, too, please?

20  
21          KEVIN GREENGRASS: Hello. My name is  
22          Kevin Greengrass, address, P.O. Box 271,  
23          Baraboo, Wisconsin, 53913. I am here  
24          representing the Ho-Chunk Nation. I am the  
25          elected official to the Ho-Chunk Nation

## RESPONSES TO COMMENTS

6

1 legislature. Maybe a few of you are familiar  
2 with the former legislator that was working on  
3 this project. Her name was Ona Garbin and she  
4 had presented me with all the information that  
5 she had received and followed up on the  
6 Hardwood Range Expansion, and as far as, like,  
7 the other program following, as far as like  
8 with the Ho-Chunk Nation, they are in total  
9 opposition to the range expansion.

10 I have gotten with the president of our  
11 Nation and the rest of the legislature and  
12 there was a resolution that was adopted in 1995  
13 concerning the Hardwood Range Expansion, and  
14 that is Ho-Chunk Nation's legislature  
15 resolution 61495D opposed to, the opposition of  
16 the Hardwood Range Expansion.

17 This is new to me, but at the same time  
18 and everything I live in area four, which  
19 represents all the areas that are in concern to  
20 Hardwood Range, and I've seen the flybys, the  
21 flyovers. I haven't been to the range itself  
22 and everything, but it's a big concern to the  
23 areas that I represent, and what it does, it  
24 affects our cultural, our religious and our  
25 social life, and there are many times where we

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 2

The potential effect of overflights on Native American cultural values, sacred sites, and religious activities is considered in Subsections 4.9.1.1, 4.9.1.2, 4.9.2, 4.9.3, 4.9.4, 4.9.5, and 4.9.6 of the EIS. Subsection 4.9.1.2 has been expanded to include additional information on potential impacts to traditional cultural resources. Judicial proceedings, whether Native American or Euroamerican, are not considered to be cultural resources.

The methods for predicting and evaluating frequent or infrequent noise, and the significance of noise created by the proposed activities are considered in Subsection 4.2.

1 have had festivals and feasts, you know, other  
2 Ho-Chunk cultural doings and this is  
3 interrupted by this, and as far as, like, the  
4 proposed expansion, on behalf of the United  
5 States government, I mean, I respect that we  
6 have to, like, be ready and prepared for when  
7 the time comes to be, when we're going to have  
8 to get into another war or any type of  
9 conflict, because I, myself, am a veteran of  
10 the Marine Corps. I served in Desert Storm,  
11 came home, protected the Constitution of the  
12 United States, and also at this time I'm  
13 protecting the Constitution of my Nation, so as  
14 a representative of my nation I stand firm for  
15 the opposition of the Hardwood Range. Thank  
16 you.

17  
18 THE MODERATOR: Thank you for your  
19 comment. I'll now call on the rest for their  
20 comments, and I would ask again, we'll use the  
21 microphone over here to my left. Please speak  
22 clearly into the microphone, and as I said  
23 before, you'll have five minutes to comment,  
24 and as you begin, I ask that you state your  
25 name and address for the official record of

## RESPONSES TO COMMENTS

1 this evening's meeting.

2 When you have one minute left of your  
3 allotted time, I will signal you. At the end  
4 of your five minutes I'll ask you to complete  
5 your comment, and, also, again, please remember  
6 that I ask that we have no interruptions during  
7 the comment period.

8 The first comment this evening will be  
9 from Edie Ehlert, followed by Marilyn Leys.  
10 L-e-y-s.

11  
12 EDIE EHLERT: All right. My name is  
13 Edie Ehlert, my address is Rural Route 21B,  
14 Ferryville, Wisconsin, Crawford County, and I'm  
15 on the board of Citizens United Against Low  
16 Level Flights, and I'm here to speak against  
17 the expansion of the bombing range and  
18 increased uses of the MOA's.

19 For myself, personally, I'm concerned  
20 that expansion will mean more flying in our  
21 area. Under present regulations we can have  
22 flights 2,000 feet or higher without any public  
23 input whatsoever, and I live in a real quiet  
24 place and I like it that way and I'd like to  
25 keep it that way, and that's my personal

**Response to Comment No. 1**

The ANG understands concern for solitude and the enjoyment inherent in the natural environment. Many ANG personnel hike, hunt, and engage in other recreational activities in the vicinity of the Hardwood Range. While the proposed Hardwood Range expansion would acquire additional land acreage, the aircraft flight operations on Hardwood Range would be confined within the existing R-6904A lateral boundaries. Similarly, flight operations will continue within the existing lateral boundaries of the Falls 1, Falls 2, and Volk South MOAs. Therefore, this proposal is not expected to adversely affect the existing environment.

0924HV

Edie

Ehlert



## RESPONSES TO COMMENTS

9

1 opinion here.

2 The other thing is I grew up north here  
3 in Wisconsin. I've lived in Wisconsin all my  
4 life and I find that the things that draw  
5 people here, both as tourists and as people to  
6 live here, is the quiet, and it's an amazing  
7 place, and I want to keep that aspect of it.  
8 I'm fine about the present military use here,  
9 but I don't want to see expansion.

2

10 The thing that bothered me the most  
11 about the DEIS is the word assessment,  
12 assessment means estimate. We were told that  
13 at a meeting for, representatives of Citizens  
14 United met with the FAA and Air National Guard  
15 representatives last spring and they made it  
16 clear to us by top ENG people that assessment  
17 means merely best guess estimate, and yet with  
18 the DEIS I've come up with five times with the  
19 phrase worst case scenario, meaning the highest  
20 level assessment, and it's just misleading.

3

21 Right now the MOA falls one and falls  
22 used seven, eight times the assessed level and  
23 yet something happened. I mean, obviously that  
24 means these assessed levels are, indeed using  
25 these terms, quells ones questions about the

4

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 3

The term "assessment" is a term from the Guidelines from the Council on Environmental Quality that address how environmental documentation under the National Environmental Policy Act are to be accomplished. The ANG provides assessments of potential impacts from such actions as airspace activity using a very conservative and reasonable "worst case" analysis. This approach gives the results in such a manner that no higher level of potential impacts would be expected. Actual impacts may be significantly less.

### Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

10

1 DEIS, and subjects differ and it's obviously  
2 misleading. I find that it's scary to me that  
3 there is so little that can be done once a land  
4 is being used by one, by the Air National  
5 Guard, for example. We can make comments, but  
6 there is very little other than that that can  
7 be done. The FAA has regulations but the FAA  
8 is not like the watch dog. The FAA is not the  
9 police to the Air National Guard. They keep  
10 track of themselves, and that's why you end up  
11 with these assessments.

12 The other thing I want to bring up is  
13 that -- let's see, which one should I decide to  
14 do? That there is a justification that this  
15 will be closer for pilots. I would like to see  
16 the real numbers of what kind of money is  
17 actually going to be saved over a 50 year  
18 period, because when you look at it, it's not  
19 very much. It doesn't seem to make sense to me  
20 that this is really an economic gain for the  
21 Air National Guard, and I would like to know  
22 how much money is being projected for this  
23 whole expansion and yet it's supposed to be  
24 such an economic thing. It doesn't hold up,  
25 from what I can figure out anyway.

### Response to Comment No. 5

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

## RESPONSES TO COMMENTS

1 The other thing is about accidents.  
 2 Anything that in the DEIS where there might be  
 3 a problem, it seems to me it is covered over  
 4 way too quickly. It says if there is an  
 5 accident, we'll just clean it up. It won't be  
 6 a problem, yet there was a crash up near Strum  
 7 not too long ago and it was six weeks before a  
 8 contract was made for cleanup. That's a very  
 9 long time, it seems to me, when you're talking  
 10 about fuel and whatever, so it doesn't tend to  
 11 make us real confident that this is indeed the  
 12 case. I would like to see real numbers on what  
 13 the price tag is going to be on these things.  
 14 As of March '96 it was \$816,000.00, and I would  
 15 like to know how much has been really spent,  
 16 what is it really costing us to do all this?

17 Another issue that comes up for me is  
 18 that the Wood County Board is adamantly opposed  
 19 to this and yet I don't see it in the DEIS.  
 20 Other than their letter, I don't see a real  
 21 address to the fact that the people here don't  
 22 want it. The majority of people don't and that  
 23 isn't being addressed clearly, and it seems to  
 24 me that's a major cultural, social thing that  
 25 needs more than a few paragraphs of being

**Response to Comment No. 6**

The initial response to an aircraft accident focuses on rescue, evacuation, fire suppression, safety, and elimination of explosive devices, ensuring security of the area, and other actions immediately necessary to prevent loss of life or further property damage. Afterwards, the investigation phase is accomplished.

If an aircraft accident occurs on non-federal property, regardless of the agency initially responding to the situation, as soon as the situation is stabilized, a National Defense Area will normally be established around the accident scene, and the site will be secured for the investigation phase.

As soon as possible after all required investigative actions on the site are complete, the aircraft will be removed, and the base civil engineer will accomplish clean-up of the site, or contract to an outside agency to accomplish the clean-up.

**Response to Comment No. 7**

Contract costs to clean up the accident site were \$103,000.

**Response to Comment No. 8**

All input from the Wood County government has been considered in both the development of the proposed action and the preparation of the FEIS.

All letters received from the public commenting on the Draft EIS or the proposal in general are displayed in the FEIS in Volumes II and III. Letters both for and against the proposed range expansion were received. The number in each category can be obtained by reviewing these letters.

## RESPONSES TO COMMENTS

Response to Comment No. 9

The ANG has been and will continue to work with the U.S. Fish and Wildlife Service, the Wisconsin Department of Natural Resources, and other regulatory agencies to exchange information and study the effects of their actions on threatened and endangered species within the areas affected by its operations. The ANG will continue this cooperative effort and adjust its operations should any information become available that would identify potential impacts on any threatened or endangered species or other wildlife.

Studies conducted on wildlife have shown that numerous wildlife species have the ability to adapt to the presence of man and various man-made sound sources, including jet aircraft noise. While the noise generated from low-altitude military overflights may be initially startling, habituation to jet aircraft noise occurs with most wildlife species. Species-specific responses to low-altitude overflights vary considerably, and responses from individual animals may have the potential to cause injury. However, wildlife populations are usually affected only when a variety of factors work in combination to impact them, including declines or fluctuations in the availability of a food source, habitat destruction or alteration, predation, hunting, trapping, poaching, disease, or inclement weather, rather than noise alone. Normally it would be unrealistic to predict or attribute any wildlife population declines to a single stressor, such as noise. In addition, no published scientific evidence was identified that indicated harm may occur to wildlife as a result of exposure to the levels of noise generated by military aircraft that would utilize the airspace associated with the Hardwood Range.

1 addressed. I would also like to know how many  
2 letters were actually received and how many  
3 were neutral, how many were in favor and how  
4 many opposed this action. It's all kind of  
5 very vague in the DEIS.

6 The other thing, and I understand this  
7 is common for DEIS, is that it states that  
8 negotiations are still going on for the fish  
9 and wildlife service for the DNR, as far as  
10 pretext of wildlife, but that means the rest of  
11 us don't get to comment on it because it's  
12 always in process. Then I want to really know  
13 how we're going to deal with any kind of  
14 problems that the wildlife could have as  
15 opposed to thinking, well, it will just be  
16 okay.

17 I think those are my biggest ones, and  
18 the other is that the military training routes  
19 were withdrawn from our area, and I think it  
20 was done largely because of the amount of  
21 public pressure and the help we got from our  
22 elected officials, and I think there needs to  
23 be hundreds, not 50, but hundreds of letters  
24 from this area, and I was hoping there would be  
25 a lot more people here that I could entice to

1 get the letters out. I used to think it didn't  
2 matter, they were going to do what they want  
3 anyway. If there are hundreds of us out there  
4 and we write letters, there is some political  
5 pull here when our elected officials don't want  
6 this, they need to hear this so that they can  
7 support their views with those statements, and  
8 there needs to be work, as far as legal work.  
9 I don't know any legal work, but people need to  
10 be --

11

12 THE MODERATOR: Ma'am, your time is  
13 up.

14

15 EDIE EHLERT: -- needs to get looked  
16 at legally to see if there are flaws in this  
17 DEIS to address. Thank you.

18

19 THE MODERATOR: Thank you for coming  
20 up. The next commenter will be Marilyn Leys  
21 and followed by David Siebert.

22

23 MARILYN LEYS: I'm Marilyn Leys,  
24 Route 2, Box 166, Gays Mills, Wisconsin, 54631.  
25 I'm a member and board of director of Citizens

RESPONSES TO COMMENTS

14

1 United Against Low Level Flights.

2 First of all, I would like to thank the  
3 offices of Senator Feingold and Senator Kohl  
4 for convincing the Air National Guard in 1995  
5 what was an adequate period for commenting on  
6 the Hardwood Proposal, and thanks to Senators  
7 Feingold and Gunderson for relaying to the  
8 public hearings like tonight's are a good idea.

9 When the environmental impact study  
10 began citizens were assured that our questions  
11 will be answered and our comments incorporated  
12 in the Draft DEIS. Tonight I would like to add  
13 to the record several comments sent to the  
14 study that were either not noted or somewhat  
15 altered.

16 The Draft EIS says, quote, the FAA  
17 manages all air space and established rules of  
18 flight and air traffic flight control  
19 procedures to govern safety aircraft procedure  
20 and defend related air space. Military  
21 operations are conducted within designated air  
22 space and follows specific procedures to  
23 minimize the hazard of high speed flight  
24 training to not participating civil or military  
25 air gravity, end quote.

Response to Comment No. 1

All comments received during the scoping process associated with this EIS were considered in the preparation of the document. Such comments, as they relate to the proposal, have helped to improve the EIS process and have become a part of the administrative record for the proposal.

## RESPONSES TO COMMENTS

15

1 Well, not always, and letters were sent  
2 to Andrews Air Force base saying so. The  
3 pilots of crop dusting aircraft working for  
4 cranberry growers have been the victims of near  
5 misses because they must fly when the weather  
6 is right, but their comments did not make it  
7 into the Draft EIS.

8 Page 3-3 of the Draft EIS acknowledges  
9 that emergency medical aircraft have  
10 occasionally been denied the use of hot MOA's.  
11 I guess the people associated with the  
12 MedFlight helicopters define the word  
13 occasionally differently than the military  
14 does. The way they told it in their letters  
15 and resolutions to the EIS, they have been  
16 forced to detour far too often when military  
17 pilots could not be called off. Moreover, as  
18 soon as patients left the aircraft, the  
19 helicopter pilots were forced to sit on the  
20 ground at hospitals sometimes three or four  
21 hours before being allowed to return to their  
22 home bases.

23 I hope that Sergeant Leo Clark is  
24 right, I hope that the system of getting the  
25 calls in has been remedied, but again what

### Response to Comment No. 2

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

## RESPONSES TO COMMENTS

16

1 primarily concerns me is that I know these  
2 letters came into the Draft EIS. There were a  
3 number of medivac helicopter pilots that were  
4 very upset and wrote to the Draft EIS and no  
5 mention is made to the fact that these things  
6 were said, and despite the reassurances in the  
7 language of the Draft EIS that military  
8 aircraft must stay a safe and legal distance  
9 from public airports, there is at least one  
10 airport in this area where civilian planes  
11 sitting on the runway have been buzzed  
12 repeatedly by military aircraft flying directly  
13 overhead.

14 Moving to a different section of the  
15 report, I would like to quote the Draft EIS on  
16 raptors. Quote, the U.S. Fish and Wildlife  
17 Service typically recommends a distance of .25  
18 miles for avoidance of impacts to bald eagle,  
19 osprey, red-shouldered hawk and peregrine  
20 falcon nests, bald eagle wintering areas,  
21 wildlife in wilderness areas and colonial  
22 birds' nesting sites. The important part is  
23 that .25 miles.

24 My friend, Maggie Jones, a licensed  
25 raptor rehabilitator has compared that quote to

### Response to Comment No. 3

The EIS accurately reflects the USFWS letter in stating that USFWS recommended an avoidance distance of 1,320 feet (0.25 mi) around eagle, osprey, hawk, and falcon nests, bald eagle wintering areas, and colonial bird nesting areas (USFWS 1995). The letter also suggests that flush responses to birds can be minimized by maintaining avoidance distances of at least a quarter mile (preferably greater than 2,500 feet) around known bird concentration areas for fixed-wing aircraft, and up to four or five miles for rotary-winged aircraft. However, the USFWS does not provide supporting rationale for these avoidance distances. The best available information regarding noise impacts to wildlife indicates that, while startle or panic responses to noise do occur in some wildlife species, these short-term responses to subsonic or supersonic noise do not result in long-term impacts, such as increased mortality or reduced reproductive success to wildlife populations. Subsection 4.8.1.3 of the EIS addresses this issue in greater detail.



1 the letter from the Fish and Wildlife Service  
2 which recommends that fixed wing aircraft avoid  
3 these sites by at least a quarter mile but  
4 preferably 2,500 feet, which is about half a  
5 mile. Rotary-winged aircrafts should avoid  
6 such sites by more than five miles, end quote.

7 The letter also suggests that during  
8 certain critical seasons of the year and  
9 certain critical areas, and here I'm quoting,  
10 flights should be prevented at all times. The  
11 folks doing the environmental impact study  
12 obviously received that letter. It's remained  
13 in an unnumbered appendix of the Draft EIS, but  
14 something seems to have gotten lost in  
15 translation.

16 I would like to also add something to  
17 the tape that we just saw. The first point  
18 that was made was the expansion of the Hardwood  
19 Range is asked for in a county forest. It's  
20 not just land. It's county forest land, folks,  
21 and the Wood County Board, as Edie said, is on  
22 record against that expansion.

23 In the tape we saw a beautiful shot of  
24 deer and waterfowls and so forth, and the tape  
25 said something about an established knowledge

1 base of environmental issues. It's a county  
2 forest, folks, it's not --

3  
4 THE MODERATOR: One minute.

5  
6 MARILYN LEYS: I have a lot of other  
7 things that I don't like in the Draft EIS. I'm  
8 an optimist. I'm going to write to the  
9 environmental impact study, let them know what  
10 it is I think is wrong with the Draft EIS and  
11 hope I'll get noticed. Thank you very much for  
12 the hearing and for hearing me.

13  
14 THE MODERATOR: Thank you for your  
15 comment. Our next commenter will be David  
16 Siebert, followed by Curtis Pluke.

17  
18 DAVID SIEBERT: My name is David  
19 Siebert. I'm an ecologist with the Bureau of  
20 Integrated Science Services in the Wisconsin  
21 Department of Natural Resources in Madison,  
22 Wisconsin, 53707.

23 I've got a statement I would like to  
24 read into the record, and I'll be speaking  
25 tonight on behalf of the Department. The

1 Department currently has a number of staff from  
2 several programs reviewing the Air National  
3 Guard Draft Environmental Impact Statement.  
4 Programs involved in the review include  
5 Forestry, Fisheries Management, Wildlife  
6 Management, Parks and Recreation, Air  
7 Management, Endangered Resources, Solid and  
8 Hazardous Waste, Water Regulation and  
9 Aeronautics.

10 Our review will focus on the adequacy  
11 of the Draft document in addressing the issues,  
12 concerns and questions raised by our letter  
13 dated March 22, 1995. In that letter, a copy  
14 of which is located in appendix G of the Draft  
15 EIS, the Department identified sensitive  
16 resources in the study area, recommended topics  
17 of study and outlined what we felt were  
18 important issues to be covered by the EIS.

19 As the document before us is a draft,  
20 we anticipate our review will identify those  
21 areas lacking and that are in need of  
22 additional information and clarification in the  
23 final EIS.

24 Although our review has just begun, we  
25 have identified some important concerns. We

## RESPONSES TO COMMENTS

1 continue to have concern about the proposed  
 2 loss of over 6,000 acres of the Wood County  
 3 forest, and its effect on timber and wildlife  
 4 management and public outdoor recreation.

5 The Draft EIS does not appear to  
 6 include an analysis of the impacts associated  
 7 with entering appropriate replacement lands  
 8 into the county forest program to offset those  
 9 proposed to be withdrawn for the expansion.

10 The Draft EIS also appears to lack  
 11 sufficient details on the biological, chemical  
 12 and physical features of specific or  
 13 approximate construction sites for proposed  
 14 facilities such as target areas, landing strip,  
 15 drop zone, service roads and fire breaks. Such  
 16 details are needed to determine the potential  
 17 magnitude of environmental impacts to sensitive  
 18 resources.

19 We expect to complete our review in  
 20 November, and we will prepare a detailed  
 21 written response to the Air National Guard.

22 Thank you.

23

24 THE MODERATOR: Thank you for your  
 25 comment. The next comment will be from Curtis

**Response to Comment No. 1**

Effects of the loss of Wood County Forest Land on land management and public recreation are discussed in Land Use Subsection 4.10, Socioeconomics Subsection 4.12 and Appendix I.

**Response to Comment No. 2**

Timber and wildlife management in the Wood County forest generally would not change as a result of the proposed range expansion. Current wildlife management goals are compatible with proposed military use of the land. Access to some areas by managers may be periodically affected; however, access would be adequate for wildlife management activities to continue at current levels.

**Response to Comment No. 3**

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

**Response to Comment No. 4**

The ANG firmly commits to not impact wetlands in development of the proposed expansion area. Best management practices would be employed to control soil erosion (i.e., vegetated buffer zones along streams and other sensitive features, use of silt fencing around construction sites, etc.) during construction of the tactical target complex, roads, landing zone, and drop zone, so erosion should be minimal. Much of the Hardwood Range, proposed expansion area, and surrounding areas are comprised of similar wetlands that would continue to function unimpeded at the regional level.

00411V

Date

Subject

1 Pluke, and he will be followed by Dick Smith.

2

3 CURTIS PLUKE: My name is Curtis  
4 Pluke. I'm from Wisconsin Rapids, Wisconsin, a  
5 private citizen, user of our natural resources,  
6 and I want to comment on the Draft EIS in a  
7 couple of areas.

8 First of all, I would like to address  
9 the issue of noise, and I think the Draft EIS  
10 tends to soften the noise issue, and they do  
11 that in a manner that many people might not  
12 pick up on, and they list an average sound  
13 level over a period of 24 hours in these areas,  
14 and unless you read appendix F about decibels  
15 you might not realize that. If you have a  
16 noise that's 80 decibels and you double that,  
17 that's 83 decibels. So if I understand  
18 correctly, when they list LDNR totals, baseline  
19 noise levels in Pittsville at 35 currently and  
20 proposed noise level 46, it's simply listed as  
21 a change in decibel as 11, and that would seem  
22 a little bit innocuous, I guess, but it's  
23 geometric in its progression there and I think  
24 it tends to understate the noise, and I don't  
25 know if that's on purpose or not, but I think

### Response to Comment No. 1

Studies on how people react to noise indicate that the important factors are how loud the sounds are, how long each sound lasts, how many times a day they occur, and what hour of the day they occur. To provide a means to evaluate the relative impacts of the noise from a particular activity, the noise measurement approach (the metric) must be a tool that can account for all these factors. The EIS uses for this purpose the widely used and accepted noise metric called the Day-Night Average Sound Level (abbreviated as DNL or Ldn) which allows noise from many different situations to be compared with each other.

Although Ldn is called an "average," it represents the total sound occurring within a 24-hour period, and is often described as a "cumulative" measure of impact. It has been shown to properly account for individual loud events of the type that may occur with military aircraft operations. However, while Ldn measures the total effect of all events, it does not describe the sound level for individual events. To address this, the EIS presents additional discussions of individual aircraft noise events and maximum sound levels that are useful to evaluate potential impacts.

Ldn still remains the primary noise metric for the assessment of potential impacts at various noise levels. Studies on noise impacts to communities have shown that to properly assess the impacts from a particular activity, it is important and useful to separate the way one individual may react to noise from the way the community, as a whole, reacts to this noise. Used in conjunction with an extensive existing body of research, the Ldn metric provides a means to accomplish this and to project a measure of the overall community reaction to aircraft noise levels associated with the aircraft operation studies in this EIS.

00514V

Curtis

Pluke

## RESPONSES TO COMMENTS

22

1 that's the effect.

2 Also, nowhere does it state maximum  
3 decibel level for a flyover event of an F-16.  
4 I hunt the Meadow Valley Wildlife Area and Wood  
5 County Wildlife area quite often and it's very  
6 often quite hard for me to have a peaceful  
7 hunt, and I have had these F-16's fly over me  
8 repeatedly. I want the EIS to state what that  
9 decibel is. I can't find it. The EIS stand is  
10 to state at the end that the noise impact is  
11 not insignificant, and I submit that the people  
12 living in Dexterville and some of these other  
13 places that are slated for an increase in  
14 decibel levels would disagree with that.

15 The next issue is biological, and I  
16 noticed somewhere in the EIS and where it was  
17 mentioned that no raptor nests were located in  
18 the proposed expansion area, and I have to  
19 think that that's not because they are not  
20 there. It's just because they could possibly  
21 be in white pines or pine trees, and it's very  
22 hard to see from the air, and just because they  
23 weren't found doesn't mean they are not there.

24 There is no mention as to the effect on  
25 low production of migratory waterfowl, upland

### Response to Comment No. 2

Data on Sound Exposure Levels (SEL) and maximum sound levels (Lmax) created by F-16 aircraft at varying distances have been added to the EIS (see Subsection 4.4).

### Response to Comment No. 3

The EIS states that suitable habitat for raptor nests is known to exist for several raptor species, including red-shouldered hawks, Cooper's hawks, red-tailed hawks, sharp-shinned hawks, and broad-winged hawks. Please refer to Appendix L of the EIS, Biological Survey of Hardwood Range, for further discussion.

DOHIV

Curia

Pluke

## RESPONSES TO COMMENTS

23

1 game birds such as the wild turkey and rough  
2 grouse. They do cite a poultry study, but  
3 that's inadequate, that poultry having nothing  
4 to do with wild game, and if you don't know  
5 what that effect is going to be, I find that  
6 unacceptable. If you can tell me that you can  
7 prove there is no effect, I guess I have to  
8 accept that.

4

9 It also doesn't address, it doesn't  
10 tell what the total population of animals is in  
11 the proposed expansion area right now and what  
12 the population will be once the expansion takes  
13 place. I would like to see some kind of  
14 estimate there.

5

15 I was also surprised to find out that  
16 the EIS states that the current bombing range  
17 can be used quite a bit for outdoor activities,  
18 and as a resident of the Wisconsin Rapids area,  
19 all I really was aware of that was being open  
20 for the nine day deer gun season. I would like  
21 to see the EIS state how many days a year will  
22 that Wood County forest land be open for public  
23 use? How much, because right now it's open 365  
24 days a year.

6

25

### Response to Comment No. 4

The best available information indicates that aircraft overflights do not result in reduced reproduction in waterfowl or other wildlife species. These studies indicate that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Please refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

### Response to Comment No. 5

A catalogue of species and population estimates for an area as large as the proposed expansion area is not feasible for this EIS, nor do guidelines for the preparation of EISs require it.

The ANG conducted a field survey of the Hardwood Range and proposed expansion area in 1995. This survey was intended to describe the general ecological character of the area, including the type and extent of plant and animal species using the area. Specific surveys were conducted to characterize the vegetation of the expansion area, locate raptor nests, and investigate areas potentially supporting Karner blue butterflies. The results of these surveys were used to identify the occurrence of wildlife species of concern for regulatory agencies; however, it is not practical to quantify populations of these species within the scope of an EIS. Please refer to Appendix L in Volume I of the EIS for more detail on the field surveys conducted for biological resources within the proposed expansion area.

### Response to Comment No. 6

The availability of lands in the expansion area to be used for outdoor activities will continue to be scheduled, though at a significantly reduced level similar to the existing range area. Predictions of the specific numbers of days such land use would be available to the public are a minimum of approximately 110 days per year with prior coordination with range personnel.

GROSSBIER

Curtis

Duke

## RESPONSES TO COMMENTS

1 THE MODERATOR: One minute.

2

3 CURTIS PLUKE: Human health issues,  
4 female fetus weights, development of embryos is  
5 unacceptable. It's in the EIS, and you have to  
6 dig into it to find it.

7

7 I have a problem with the DNR. George  
8 Meyer -- I don't have a problem with the DNR,  
9 but George Meyer directed the Air National  
10 Guard to address the issues of replacing that  
11 county forest. How does Wood County do this if  
12 you take this land? It wasn't addressed. It's  
13 a big problem. How are we going to replace  
14 that land if you take it, and I just, I guess I  
15 have a problem with the Air National Guard  
16 taking that land. It's our land. It's not  
17 your land. I realize you have eminent domain,  
18 but we use that land and there are a good  
19 number of us who are against it, but it is  
20 slightly intimidating to go up against the U.S.  
21 Government, and I don't want to appear  
22 unpatriotic, because I'm not, but it's tough to  
23 do, and I think that's why some people don't  
24 comment, but believe me, I think you'll see a  
25 big turnout in Rapids, and we don't want you to

8

### Response to Comment No. 7

A discussion of human health effects is included in Subsection 4.13 of the EIS.

### Response to Comment No. 8

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

0051TV

Curtis

Pluke



RESPONSES TO COMMENTS

25

1 take our land. I'll pay the extra dollars to  
2 have you flyover to Sawyer or Greenling. I  
3 don't mind paying for defense, but don't take  
4 our land.

5  
6 THE MODERATOR: Thank you for your  
7 comment. The next commenter is Dick Smith.

8  
9 DICK SMITH: I would like Pat Conway  
10 to speak in my place, and I will speak in her  
11 place.

12 PAT CONWAY: We're just going to  
13 trade places, because I have to leave. My name  
14 is Patricia Conway, Route 1, Box 220, Ontario,  
15 Wisconsin, 54651, and I'm going to break my  
16 comments into three separate sections because  
17 I'll be speaking at all three public hearings.

18 The purpose of my comments at all three  
19 hearings will be to show that the EIS on this  
20 expansion of Hardwood bombing range is  
21 incomplete, untruthful and a waste of  
22 taxpayers' money.

23 First, I think that the no action  
24 alternative as presented in the EIS is an  
25 outright lie. The EIS asserts that the no

Response to Comment No. 1

The term "requirements" means training can not be accomplished unless the item or situation is available. The text has been revised for clarification. Experience has established a goal that ranges should be 7 miles by 5 miles in size to conduct optimum training. However, many types of training can be accomplished in smaller areas, though not as effectively as with a larger area.

GROSSBIER  
Patricia  
Conway

## RESPONSES TO COMMENTS

26

1 action alternative would mean that military  
2 would continue to train using the current  
3 range, so what that means is the no action  
4 alternative means that if there is no  
5 expansion, then nothing will happen and the  
6 Guard will continue to train on the existing  
7 land area. I don't think that that's true,  
8 because in the same EIS, on page 2 dash 15 it  
9 says, experience has shown that realistic  
10 training for tactical aircraft requires a land  
11 area at least seven miles by five miles for  
12 target dispersion. Well, friends, the existing  
13 Hardwood bombing lane is a measly two miles by  
14 six miles, but what Air Force requires is five  
15 miles by seven miles, so let's be clear, first  
16 of all, that we're not talking just  
17 continuation or improvement of training.

18 We're talking about the life and death  
19 of the existing bombing range, I truly believe,  
20 and I am certain, and I think we can prove this  
21 in court, that if the range does not expand, it  
22 will close, and I'm really angry that that  
23 closure was not studied either as an  
24 alternative, because closure is very expensive,  
25 and my contention is that they are trying to

-2

### Response to Comment No. 2

At this time, there are no plans, policies, or issues that would lead to the immediate closing or reduction in use of the Hardwood Range.

Don't

Patricia

Conway

## RESPONSES TO COMMENTS

27

1 keep the range open simply because they don't  
2 want to close it, because if they close it,  
3 they are going to have to clean it up, and the  
4 name of the game today in the environment is  
5 cleaning up military toxic sites, so I think  
6 that it's unrealistic to not look at those  
7 things, and I think it's illegal.

8 The EIS requires a detailed analysis of  
9 each alternative that's considered or not, that  
10 they are not going to go with, and they have  
11 not really looked at that question of the  
12 existing range, but, really, more importantly I  
13 question the legality of this land acquisition,  
14 because the taking of Wood County, Juneau, the  
15 Wood County forest land, and I'm very  
16 distressed that the existing EIS does not  
17 mention that we are, a group of citizens are  
18 opposing the withdrawal of the Juneau County  
19 portion of the existing range. That's 3,400  
20 acres of existing county forest in the existing  
21 range, and we intend to win that case in court.

22 So what that will mean is that they  
23 won't be able to withdraw that land from county  
24 forest programs. We don't care if they  
25 continue with the lease arrangement. We don't

### Response to Comment No. 3

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

### Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 care if the range can stay open, if somehow  
 2 they can manage it with that existing space,  
 3 but we do care very seriously about that  
 4 precedent of withdrawing county forest land  
 5 from our state protected systems, because if  
 6 they can withdraw in Juneau County, then they  
 7 can withdraw in Wood County, so, again, we do  
 8 not object to the lease but we do object to  
 9 this action to withdraw, and for my Ho-Chunk  
 10 friends, I would just like to ask them, or  
 11 advise them that if the withdrawal of the  
 12 Juneau County forest portion does go through  
 13 and Juneau County puts the land up for sale,  
 14 then I believe that the Ho-Chunk have first  
 15 right to buy that land, so it seems to me that  
 16 you would also have the right to buy the Wood  
 17 County portion of it if it were to go up for  
 18 sale, if it were withdrawn from the program, so  
 19 I really think it's beyond the realm of  
 20 possibility for the Federal Government to  
 21 purchase outright either the Juneau County  
 22 portion or the expansion land in Wood County,  
 23 and I would like to have further discussion  
 24 with that with the Ho-Chunk Nation.

5

**Response to Comment No. 5**

See response to Comment No. 3.

## RESPONSES TO COMMENTS

1 THE MODERATOR: One minute.

2

3 PAT CONWAY: We, the people of  
4 Wisconsin, then tend to fight the removal of  
5 our county forest both in Juneau County and if  
6 it should come to it Wood County from public  
7 domain. We will use our elected officials to  
8 take a stand against the use of our county  
9 forest land against bombing and strafing and  
10 will go to court whenever necessary to prevent  
11 the Federal Government from trampling on our  
12 state's laws which protect forest land for  
13 future generations.

14 I think it's a misunderstanding to  
15 claim in the EIS that the Wood County forest  
16 land belongs to Wood County. It belongs to the  
17 entire citizenry of Wisconsin programs. The  
18 Federal Government does not understand county  
19 forest programs, but our taxpayer money  
20 maintains those county forest lands for use by  
21 all citizens of Wisconsin, so the other concern  
22 we have is that no one has talked about a  
23 better and higher use of county forest land.

24 If the land is to be withdrawn, state  
25 law requires that better and higher use be

#### Response to Comment No. 6

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

#### Response to Comment No. 7

See response to Comment No. 3

RESPONSES TO COMMENTS

30

1 demonstrated. Because it's protected right now  
2 for recreation and wildlife protection, et  
3 cetera, we have not seen that anywhere. We  
4 have not seen any mention of that argument or  
5 that exclamation of how you can turn county  
6 forest land into a bombing range and call that  
7 a better and higher use. I'll make more  
8 comments tomorrow night.

9  
10 THE MODERATOR: Thank you for your  
11 comments. Our next commenter will be John  
12 Hamm, followed by Pat Conway.

13  
14 JOHN HAMM: Boy, those are some tough  
15 acts to follow. I'm John Hamm. I live in  
16 rural Mauston in Marion Township. I'm a former  
17 Marine Corps infantryman, and I'm president of  
18 the Wisconsin River Needs, and I'm not  
19 representing anyone but myself.

20 First, I want to say the Citizens  
21 United would have you all believe that everyone  
22 in the state is against the Hardwood Range, but  
23 I'm here to say that that is not the case. I'm  
24 kind of nervous here. Volk Field, Fort McCoy  
25 and the Hardwood Range have been good neighbors

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

31

1 of ours for years. The troops are welcome  
2 visitors to our community and their patronage  
3 to my business and businesses I service are  
4 very important to our community.

5 Many other people enjoy visiting Volk  
6 Field, the Hardwood Range and Fort McCoy, and  
7 their economic impact is important to our  
8 community.

9 I also have a little farm, and my  
10 family has farmed for years in Marion Township,  
11 and we've had fixed wing and helicopter flights  
12 over our land for years, and they've been no  
13 more disturbing to our livestock or to the  
14 wildlife than boats on the river or motorcycles  
15 or loud cars. They are just a part of life  
16 that we accept.

17 As a former Marine Corps infantryman  
18 I'm sympathetic to our men in uniform. As a  
19 squad leader in the Marine Corps, one of the  
20 toughest things you do is to call for fire in  
21 fixed wing aircraft, and it's a very difficult  
22 maneuver, and we owe it to our troops to know  
23 that the runs are going to fall on target and  
24 not on them. In the Gulf War and in Vietnam  
25 many soldiers were unnecessarily killed by

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 friendly fire, and my contention is if  
2 expansion of the Hardwood Range in future  
3 conflicts will save the life of one infantryman  
4 or one airman, it will be worth it.

5 I would like to, in summary, say that  
6 me, my family and I support the armed force of  
7 the United States and we support the Wisconsin  
8 Air National Guard, and we think that they  
9 should do their best to promote the training  
10 and welfare of their persons in the military,  
11 and it's the government's responsibility to  
12 provide them with the best responsible  
13 training. Thank you.

14  
15 THE MODERATOR: Thank you for your  
16 comments. Next commenter is Pat Conway,  
17 followed by Gene Ramer.

18  
19 DICK SMITH: I'm taking, switching  
20 with Pat Conway. My name is Dick Smith, Route  
21 4, Sparta, 54656.

22 Like the last speaker, I support the  
23 armed forces. However, I support the safety of  
24 the armed forces and the safe training by  
25 what's called government accountability, and



## RESPONSES TO COMMENTS

1 certainly military accountability. I believe  
 2 there should be. Something we haven't seen in  
 3 this process or even reference to the master  
 4 plan for the United States of America, what do  
 5 we need? What exactly do we need? What? Do  
 6 we have enough ranges? Do we not have enough  
 7 Air Force? And tonight I would like to go on  
 8 the record saying I'm disappointed there aren't  
 9 more copies of Draft EIS around. I don't see  
 10 any extra copies of it here tonight. This is  
 11 just like the meeting up in Black River Falls  
 12 on the MOA. There wasn't one copy of the  
 13 proposal in the building. I maintain it's not  
 14 that hard to haul them here. I say it's a  
 15 deliberate ploy.

16 In Wisconsin we are drafting new  
 17 legislation on the mining industries because of  
 18 the environmental concerns, like what is the  
 19 track record? I think we should also take a  
 20 look at the track record of the Air Force.

21 There is hardly a day goes by that I  
 22 don't hear about some Air Force aircraft  
 23 crashing. The recent one with the, I think an  
 24 F-117. No one was killed, at least that's what  
 25 they told us, so that track record should be

Response to Comment No. 1

The issues raised by this comment are beyond the scope of this EIS.

Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

1 entered into this thing.

2 One of my big pet peeves is the wetland  
3 issue. We have about less than one page  
4 devoted to the wetland in this EIS. When we  
5 were at the range a couple years ago in the  
6 spring of the year, unless you were actually  
7 standing on a pile of dirt we dug out of a  
8 trench, you were standing in one foot of water.

9 All the land around it is wetland. There is a  
10 sunken glacier lake. Doesn't the Air Force  
11 understand this? Where is the EPA in this  
12 process, and where is our DNR?

13 We just heard Mr. Siebert give a weak  
14 presentation saying you have to address our  
15 issues, supposed to have been addressed in this  
16 document. Now he wants to address them in the  
17 middle of the winter. Why aren't they  
18 addressed? Now we have executive order 11990  
19 on wetland. This is not followed at all. This  
20 has to do with wetland facilities and the  
21 treatment of wetland. This whole thing is a  
22 wetland.

23 Also the Federal Facility Compliance  
24 Act of '92 stating that federal facilities must  
25 comply with local hazard waste laws, that

### Response to Comment No. 3

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

### Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

00614V

Dick

Smith

## RESPONSES TO COMMENTS

1 includes putting explosives in flood plains,  
2 wetland explosives in any area automatically  
3 turns that area into a superfund. This whole  
4 range out there now is superfund. The  
5 ammunition dump is definitely superfund, very  
6 close to county land, supposed to have been  
7 leased for buffer zone. It's been turned into  
8 a superfund. If they don't get the withdrawal  
9 on the land sold to the Air Force, guess what?  
10 Juneau County's got a mess on their hands.  
11 They could be sued by the citizens of the State  
12 of Wisconsin for illegally using county forest  
13 for an impact area, turning it into a  
14 superfund. That's not a higher and better use,  
15 just, that's what the withdrawal is talking  
16 about, and Juneau County and the withdrawal  
17 that they are going to have to go through in  
18 Wood County taking county forest, turn it into  
19 a superfund which can never be cleaned up,  
20 never. If you can clean it up, certainly show  
21 Fort McCoy how to do it. They've got a 7,600  
22 acre range out there currently used by the  
23 guard, and there is a picture out here on the  
24 table, it's superfunds that can never be  
25 cleaned up.

**Response to Comment No. 5**

Only one defense Installation Restoration Program (IRP) project is located on the range. This site was used from 1976 to 1988 for annual burning and burial of spent munitions. Volatile organic compounds and semi-volatile organic compounds were detected in some samples. An IRP Feasibility Study for five sites (4 at Volk Field and one at Hardwood Range) was developed and has been recently (March 1998) released for public comment. The IRP site is located in the southwestern portion of the range approximately 0.5 miles from either border. A map has been included in the FEIS. Neither the existing range nor the proposed range is a superfund site. The text has been modified to include this information.

1 According to the Colonel at Fort McCoy,  
2 they should have known better. There are other  
3 pictures people have shown me of bombs lying in  
4 the river like dolphins swimming around. The  
5 river was ground zero. Anybody with any sense  
6 avoided the rivers.

7  
8 THE MODERATOR: One minute, sir.

9  
10 DICK SMITH: The Air National Guard  
11 is using that, the process of land dropping,  
12 though is not addressed in the EIS. Wood  
13 County says now, what are they going to do,  
14 slap another piece down? What's the money  
15 thing here? Is there any limit from the Air  
16 Force how much money, how much time?

17 There seems to be no limits. Ten  
18 years, people, land future's been on hold.  
19 There seems to be no limit. Of course, what  
20 are the F-117 costs, you know, half a billion?  
21 It's nothing. Eight or nine of them crashed  
22 already. I'll be commenting at the next two  
23 public hearings. Thank you.

24  
25 THE MODERATOR: Thank you for your

#### **Response to Comment No. 6**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 comment. The next commenter is Gene Ramer.

2

3 GENE RAMER: I would like to pass at  
4 this time.

5

6 THE MODERATOR: Okay. That's all of  
7 the cards that I have that anyone has signed up  
8 for. Does anyone wish to make a comment that  
9 hasn't signed up before?

10 Okay. I think we'll take -- since I  
11 said we would go to approximately 9:00 p.m.,  
12 we'll take about a 15 minute break right now,  
13 and then reassemble in here and we'll finish up  
14 at that point then with Mr. Ramer.

15

16 GENE RAMER: No.

17

18 THE MODERATOR: You don't wish to  
19 comment tonight at all?

20

21 GENE RAMER: No.

22

23 THE MODERATOR: Okay. Well, let's  
24 take a 15 minute break. Come back in here in  
25 15 minutes then. Thank you.

RESPONSES TO COMMENTS

38

1 I might add, if there is a need, there  
2 are Air National Guard representatives  
3 available to address questions and comments  
4 directly with you.

5  
6 (Break taken.)

7  
8 THE MODERATOR: Now, 15 minutes is  
9 up. I ask you to reassemble, please. Thank  
10 you and welcome back. We'll continue on with  
11 the formal comment period.

12 I do have one more card that a person  
13 has requested to speak. Are there any others  
14 that wish to fill out a card or wish to be  
15 included? Okay. Our next speaker or next  
16 commenter will be Dawn Ramer.

17  
18 DAWN RAMER: My name is Dawn Ramer.  
19 I live at 919 East State Street, Mauston,  
20 Wisconsin, 53948. I'm here as a citizen.

21 I've lived in Juneau County all my  
22 life. I respect the military very much so, and  
23 I've listened to everybody here regarding the  
24 flyovers and the noise. I've lived on a farm  
25 most of it. I've had them fly over. It has

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 not bothered my family's farm, wildlife or  
2 anything around them.

3 My husband is also in the military, but  
4 I have my own opinions regarding some of their  
5 things, but right now the military is cutting  
6 back on downsizing. I believe that we need to  
7 end up, since they are downsizing everything,  
8 they need to end up being trained even better  
9 to defend this country and other countries that  
10 they are associated with. If this means an  
11 expansion of the range will help them in doing  
12 this, I'm for this.

13 Our military needs our backing. I  
14 understand economical and environmental  
15 reasons, especially living on a farm, the  
16 worries of how it's going to impact on the  
17 wildlife and everything else. I feel that the  
18 military will look into this because they are  
19 interested in this, and I don't think they are  
20 going to go in and decide to destroy this area  
21 just for the sake of training.

22 People have discussed about bombs being  
23 in rivers. I've also visited other cites, Volk  
24 Field is one of them. They have an abundance  
25 of deer population. They have turkeys and they

1 have other wildlife there. It has not  
2 diminished at all. They are thriving there. I  
3 don't think the military is going to do  
4 anything that's going to destroy this section  
5 of the land.

6 I know country living is wonderful.  
7 I've lived in the quiet lanes, but I've never  
8 had the military, because of the flyovers or  
9 anything, disturb that quietness. It's no more  
10 noisier than having tractors or other vehicles  
11 or anything like that being any more  
12 destructive or noisy, whatever you want to  
13 describe. It has never harmed anyone  
14 otherwise, and to my point of view, I think  
15 people should back their expansion. Our  
16 military needs our support. They need to be  
17 trained to the optimum. Desert Storm and  
18 Desert Shield had proved that. I think we now  
19 need to stand by them, not fall by the wayside.  
20 Thank you.

21  
22 THE MODERATOR: Thank you for your  
23 comment. That is the complete list of those  
24 that have signed a card. Are there others that  
25 wish to comment? Yes, ma'am.



1

2

VICTORIA BRZEZINSKI: Yes, may I?

3

4

THE MODERATOR: Have you got a card?

5

6

VICTORIA BRZEZINSKI: No, I do not.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

THE MODERATOR: Perhaps somebody can  
get you one, but come on up. You want to  
comment, is that --

VICTORIA BRZEZINSKI: Yes, I do. Do  
I have to fill out the card before I comment?

THE MODERATOR: No, just so we get a  
card on you. You can do it as soon as you have  
completed your comments, please, but give your  
name and address.

VICTORIA BRZEZINSKI: My name is  
Victoria Brzezinski, N8726 County Highway M in  
New Lisbon, so I am a Juneau County resident,  
and what brought me here tonight was I own a  
little place in the country and all summer long  
I have had low flying jets flying over my

1 property. I would assume they are low flying.  
2 I can see their landing gear. I have cargo  
3 planes going over, I see the shadows.

4 It is a problem. It is a real problem,  
5 and when you live in the country, and you are  
6 in the country for that purpose, for the  
7 peacefulness, for the quietness, for the  
8 nature, when your thoughts are bombarded and  
9 jarred by the sounds of jets going over daily,  
10 almost all day long sometimes, and sometimes  
11 they started engines at 7:30 in the morning,  
12 they may fly a couple of hours, they stop. A  
13 few hours later you hear more, so it's not  
14 sometimes like you just get some of it and then  
15 that's the end of it. You never know how long  
16 it's going to be, and that's just my biggest  
17 comment.

18 The noise is a real problem, and it's  
19 just interesting that that brought me to here.  
20 I talked to Senator Feingold's office and they  
21 told me about this meeting tonight, and I would  
22 like to -- I'm going to definitely follow this.  
23 It is also about the land, about a lot  
24 of different things. I just wanted it very  
25 clear to people that the noise is an extreme

**Response to Comment No. 1**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

**Response to Comment No. 2**

As recognized in Subsection 4.2.1.1 of the EIS, noise is unwanted sound, and it is one of the most common environmental issues associated with aircraft operations. Data on sound levels created by F-16 aircraft at varying distances have been added to the text of the document. None of these sound levels is loud enough to cause physical harm, but some are loud enough to startle or create annoyance. Noise impacts depend not only on the maximum sound level, but also on how long each event lasts and how often the event occurs. Day-Night Average Sound Levels (Ldn and Ldnmr) are used in the noise analysis because they have been found to best reflect the combined effect of these factors. Additional information on the use of cumulative noise metrics is contained in Subsection 3.2 and Appendix F in the EIS.

010HV Victoria Brzezinski

1 problem, extreme sometimes, and I understand  
2 and I support the Guard.

3 I understand we needed training. It's,  
4 I think, everybody is kind of stuck between a  
5 rock and a hard place right now, but it's  
6 something that the noise is a major problem for  
7 me. It grinds on your nerves after a while.  
8 It just gets to you. Thank you for your time.

9  
10 THE MODERATOR: Thank you for your  
11 comment. Will you make sure that -- Jeff, we  
12 need another card here to fill out. Thank you.  
13 Are there others that wish to comment as new  
14 commenters? We do have a little time if there  
15 are others in the room that wish to make  
16 additional comments. We do have time for that.

17 Okay. We'll abide by the same rules of  
18 the five minute time period.

19

20 CURTIS PLUKE: Sure. I won't be five  
21 minutes.

22

23 THE MODERATOR: Again, state your  
24 name. I know we have your card, but state your  
25 name and address again.

1  
2 CURTIS PLUKE: My name is still Curt  
3 Pluke, and I'm still from Wisconsin Rapids.  
4 There were a couple of things I wanted to  
5 comment on and I didn't have time in the  
6 original five minutes, and the first part that  
7 I'll comment on right now is biological  
8 resources, and the EIS states that normally it  
9 would be unrealistic to predict or attribute  
10 any wildlife population declines to a single  
11 factor such as noise.

12 In addition, no published scientific  
13 evidence was identified that indicated  
14 long-term harm may occur to wildlife as a  
15 result of exposure to levels of noise, et  
16 cetera, but that doesn't mean simply because  
17 the research isn't there that there is no  
18 impact.

19 It also states in a couple paragraphs  
20 down that disruption of habitats of these  
21 speices through construction activities are  
22 used to the tactical target range may adversely  
23 affect these speices, however, additional  
24 habitats will exist in the target complex, so  
25 that tends to minimize the destruction that's

#### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

01131V

Curtis

Pluke

## RESPONSES TO COMMENTS

1        gone on by saying, well, it exists elsewhere so  
 2        therefore we can sacrifice this amount, and I  
 3        guess I have a problem with that.

4                Also, I don't know how deeply the  
 5        Ho-Chunk people are involved in identifying  
 6        possible burial sites, but I would have to  
 7        think that since this historically occupies  
 8        land that's in this 6,000 plus acres of county  
 9        forest, that there must be grave sites of  
 10       Native Americans, and I would think that tends  
 11       to make that ground somewhat sacred, and then  
 12       lastly, back to the noise issue, and the EIS  
 13       does mention a couple of studies, that that one  
 14       study indicated noise on the health of adults  
 15       living near airports.

16               I won't mention names, because I  
 17        probably won't pronounce them right, but it's  
 18        on page 4 dash 85, suggested that morbidity due  
 19        to hypertension and nervous disorders was  
 20        higher in the areas closest to the airport, and  
 21        then further down another study in the aircraft  
 22        noise exposed area, the purchase of drugs for  
 23        hypertension increased gradually up to twice  
 24        its initial quantity, so I think there is  
 25        statistic evidence if you look far enough, and

**Response to Comment No. 2**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

**Response to Comment No. 3**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 I was glad to see that it's included, that I  
 2 think there are adverse environmental impacts  
 3 here, and I just hope that the decision makers  
 4 take all this into account, and that's all I  
 5 have.

6  
 7 THE MODERATOR: Thank you for your  
 8 comment. Are there any other comments? Any  
 9 other comments? Yes, again, please state your  
 10 name and address.

11  
 12 DICK SMITH: My name is Dick Smith,  
 13 Route 4, Sparta, 54656, and, yes, I will  
 14 repeat, saying we do need better training  
 15 needed, but this doesn't necessarily mean more  
 16 aircraft and more money.

17 The Pentagon over the last several  
 18 years got \$35 billion more than they even  
 19 wanted from Congress. Somewhere in this whole  
 20 process we should address the inappropriate  
 21 kick and run of soft hard money campaign  
 22 donations and the lobbying of the armory  
 23 industry.

24 We should all know, and this should be  
 25 made a note of, that United States of America

#### Response to Comment No. 1

The issues raised by this comment are beyond the scope of this EIS.

012HV

Dick

Smith

1 citizens do not own ammunition plants, though,  
2 my knowledge it may be one little shell plant  
3 on the east coast, otherwise ammunitions are  
4 privately owned by shareholders. The U.S. Arms  
5 is part of the Pentagon, although it's a  
6 private corporation with the CEO being Bill  
7 Clinton, and I have their annual report from  
8 1993 and they said there is no moral world  
9 anymore, so they don't have any obligation to  
10 support one side or the other. They think they  
11 have an obligation in the armor industry to arm  
12 everybody. That's their answer to world  
13 conflict, but the aspect of needing better  
14 training, it doesn't cost anything for people  
15 to use common sense when they are up in the  
16 aircraft.

17 I just talked to Colonel Thomas over  
18 here and he verified that, yes, there were  
19 three guys up high altitude. They decided to  
20 moon somebody else next to them. They took  
21 their oxygen masks off. These Air Force guys  
22 all passed out, and the plane crashed. I don't  
23 know how that crap goes on. In California I  
24 know one plane that decided to fly under  
25 electric lines and took down a bunch of lines

#### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

48

1 with it, set down about 50,000 electric  
2 subscribers.

3 In this whole process it really hasn't  
4 been fair to us people out here that don't have  
5 the money. We are a socially, economically  
6 poor area, especially up in Adams County, but  
7 the Guard was able to send out a letter to all  
8 the Guardsmen in Wisconsin. I believe it went  
9 to every one of them, a letter asking for help,  
10 then sending out fax sheets, not only that they  
11 sent out form letters for the Guardsmen to  
12 respond.

13 Now, are those responses going to count  
14 as well as somebody whose farm is being  
15 impacted? I don't think those letters should  
16 count and I didn't see those letters included  
17 in the Draft EIS when other agencies had put  
18 their letters in there.

19 What about the eventual closure and  
20 cleanup of a business? You want a new range?  
21 They should always be addressing that. 20, 30,  
22 40 years from now what if they get a new range  
23 and want to close it up? What about it? Can  
24 it be cleaned up? Who gets the land after  
25 that? Not to mention Volk Field. What if the

Response to Comment No. 3

At this time, there are no plans, policies, or issues that would lead to the immediate closing or reduction in use of the Hardwood Range.



## RESPONSES TO COMMENTS

1 base was closed at Volk? Who is going to get  
2 the land? Do the tribes in the area get first  
3 grabs at it? Do the people who lost the land  
4 originally get first grabs at it?

5 As long as we're talking about Volk  
6 Field, let's talk about the mess that's out  
7 there. This should have been cleaned up.  
8 There is an ammunition dump out there that's  
9 leaking right next to a stream. There are  
10 several cases out there I would consider  
11 superfunds, but we haven't had the money to  
12 clean them up. Well, is that the way they are  
13 going to be treating new facilities they are  
14 going to add north of there, if there is a  
15 problem, not going to have time to clean it up?

16 It's my understanding glacial lakes  
17 like this area out here, the water that comes  
18 infield, some kind of aquifer someplace, I  
19 haven't gone completely through the EIS Draft,  
20 but I think that should be addressed.

21 In Indiana, I think in the Chesapeake  
22 Bay area or Massachusetts someplace, the EPA  
23 recently closed down a federal military  
24 facility because the bombing range there was  
25 polluting the aquifer feeding the people. Is

**Response to Comment No. 4**

The proposed action focuses on expanding the existing Hardwood Range and associated airspace. No construction activities or operations and maintenance activities that could potentially cause a superfund site are proposed for Volk Field under this action. However, the defense Installation Restoration Program (IRP) project sites at Volk Field and the Hardwood Range continue to be studied and monitored. A Feasibility Study for these IRP sites was released in March 1998, for public comment. The study indicated that the IRP site at Hardwood Range would be monitored for contamination for the next 10 years.

**Response to Comment No. 5**

Background information discussing the geology and physiography of the area is provided in Subsection 3.5.1.1. This Subsection describes effects from the historic occurrence of the glacial lake, Lake Wisconsin, on the soils and geology of the area. Descriptions of groundwater resources in the area and baseline water quality are provided in Subsection 3.6.1.2. As discussed, the elevation of the shallow aquifer often raises above the ground surface level during periods of high precipitation, demonstrating that strong relationships exist between surface water and groundwater. Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsection 3.3.3.1 (Aircraft Mishaps), Subsection 3.3.4.1 (Munitions Use and Handling), and Subsection 3.4.1 (Hazardous Materials and Solid Waste). Potential impacts to both surface and groundwater resources and water quality are discussed in Subsections 4.6.2.1, 4.6.2.2 and 4.6.2.3. Based on the information provided in Section 3, adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. Subsection 4.5.2.3 (Water Quality) was modified to reference the identified appropriate sections in Section 3 and discuss conclusions regarding groundwater quality.

## RESPONSES TO COMMENTS

1 this happening here?

2 One part of the EIS is to increase the  
3 load, that load at falls one. Now, I thought  
4 these here weren't going to be increased any,  
5 but we found out at the hearing last winter, I  
6 found out by, I happened to stumble in by, I  
7 thought it was something else, I didn't know  
8 the Air Guard had a hearing up there. I  
9 thought it was something else to do with land  
10 leases, but --

11

12 THE MODERATOR: Sir, one minute.

13

14 DICK SMITH: They were flying more  
15 than 700 percent more than they were supposed  
16 to in that area, and about a month ago at our  
17 own farm near Sparta I was doing some hoeing  
18 and a couple of wart hogs came and started  
19 flying around and around and around, not very  
20 fast, and I was surprised to see wart hogs  
21 still flying. It wasn't too long, and I could  
22 smell the fuel coming from them and I could see  
23 it.

24 Now, I'm really big on organic farming,  
25 although I'm not certified, but people who are

Response to Comment No. 6

The EIS evaluated aircraft air pollution resulting from each of the alternatives studies in the EIS using scientifically validated emissions modeling tools designed to predict ground-level pollutant concentrations. The cumulative air pollution concentrations, as determined through computer modeling for each of the airspace segments, could increase or decrease depending upon a variety of factors. These factors include the type of aircraft using the airspace, their altitude, frequency, power setting and meteorological conditions rather than a strict proportional relationship to the number of sorties flown. Nonetheless, under the reasonable worst case scenario modeled for each airspace segment under each of the alternatives, no air pollution concentrations resulting from aircraft operations would cause any local area to be out of compliance with Federal or State standards or make any significant impact on air quality in any area. Also, when comparing these air pollution concentrations with Federal and State limits for the Prevention of Significant Deterioration (PSD) in air quality, all levels were far below minimums.

6

012HV

Dick

Smith

## RESPONSES TO COMMENTS

Response to Comment No. 7

The ANG takes the public's concerns about pilot accountability very seriously. Any misconduct by a military pilot is a serious matter. If a member of the public is experiencing any problems with the military's operations in any of the airspace in the area that affects a person directly, the public affairs officer at the nearest military installation should be contacted immediately, or call (608) 245-4339.

The Federal Aviation Administration and each military service have very strict rules to ensure pilots stay within defined training airspace. The rules govern minimum altitudes, maximum speed, and type maneuvers that can be performed inside and outside designated training airspace. Military commanders have the authority to suspend pilots who willfully violate flight rules, such as flying outside designated training airspace. The military closely manages the airspace they use to ensure they do not exceed planned parameters.

1 certified, and this is a big, important thing  
2 in Wisconsin, now would not be certified. If  
3 they are underneath a fly zone area where that  
4 sort of training goes on, and I understand that  
5 four percent of authorities must be known, so  
6 people think their lanes have ended at your  
7 house. You're wrong, and the last thing I want  
8 to see is that Air Force instructions are not  
9 enforced, whether they want to say in their  
10 report, they call it Air Force requirements,  
11 when we say, well, why don't you go by this?  
12 They say, these are only instructions. We  
13 don't have to enforce them.

14 Well, legislatively there doesn't seem  
15 to be any control on the Air Force. Certainly  
16 FAA doesn't tell them what to do. It's the  
17 other way around.

18  
19 THE MODERATOR: Thank you for your  
20 comment. Are there any other comments? Yes,  
21 do you have a card? The next commenter is Tom  
22 Reis, and then I'll ask if there will be any  
23 other comments. Please give your name and  
24 address.

25

## RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 TOM REIS: My name is Tom Reis,  
2 address is N8902 Dicks Road, Camp Douglas,  
3 Wisconsin.

4 This is the first hearing I've been at.  
5 I came down, haven't read the EIS, but I'm, I  
6 guess, a little confused. I hear a lot of  
7 things about Volk Field, Fort McCoy, which I'm  
8 not sure having anything to do with the  
9 Hardwood Range expansion.

10 I hear a lot of comments about how the  
11 Air Force shouldn't be flying in some areas  
12 because of environmental issues, and then I  
13 also hear that they shouldn't be flying because  
14 of crop dusters and other things in the areas,  
15 and I guess my question to the people who are  
16 making the comments is, if the Air Force  
17 doesn't fly, does that also include the crop  
18 dusters and the medivac people? If we're not  
19 supposed to be flying around some of the  
20 nesting areas, and I forget what the comment  
21 was somebody made, raven nesting areas or  
22 something like that, if the Air Force isn't  
23 supposed to be flying, then I'm assuming that  
24 the same people the Air Force is impacting,  
25 which is the crop duster and medivac aircrafts,

- 1

1       should not be flying those areas, and the same  
2       restrictions should be there, and the people  
3       complaining about that, are they aware that  
4       those restrictions are there? Is everybody  
5       playing or not, or just the Air Force? I guess

6             I'm just confused myself. I live about  
7       six miles by road, maybe three miles straight  
8       line distance from Volk Field. You talk about  
9       them flying over. I can tell you that they do  
10      start at 7:00, 7:30 in the morning. I can tell  
11      you they fly at night. I can tell you they've  
12      got C-130's flying. I can also tell you I've  
13      got three healthy children. I've lived there  
14      for 20 some years. I can tell you I have deer  
15      in the front yard. I can tell you my daughter  
16      took pictures not more than three months ago of  
17      a black bear in our front yard. I have turkey  
18      in my front yard, and I guess I'm just a little  
19      confused where all these facts, and the people  
20      are talking, so I guess my bottom line issue  
21      here is I'm still confused.

22             I'm also still in favor of the range  
23      expansion because I really haven't heard any  
24      real details, but, again, on the other hand I  
25      haven't read the EIS either, so I wasn't going

RESPONSES TO COMMENTS

54

1 to comment, but I just thought I would let you  
2 know, some of the people, I'm getting a mixed  
3 message sitting out here. Thank you.

4  
5 THE MODERATOR: Thank you for your  
6 comments. Are there any other comments? Any  
7 other comments? Finally, any other comments?

8 I know we're a little ahead of our  
9 schedule of adjournment time, but I appreciate  
10 the courteousness everybody has displayed here  
11 tonight in staying in the time frame that was  
12 established and no interruptions. I really do  
13 appreciate that.

14  
15 CURTIS PLUKE: Could I --

16  
17 THE MODERATOR: Pardon?

18  
19 CURTIS PLUKE: Could I make a  
20 suggestion for the next hearing?

21  
22 THE MODERATOR: Certainly.

23  
24 CURTIS PLUKE: That there be a podium  
25 available for the commenters, because it's very

} 1

**Response to Comment No. 1**

Comment noted. A podium was added for all subsequent meetings.

014114

Curtis

Pluke

1       difficult to stand up there and hold papers.       ]

2

3               THE MODERATOR: Okay. That's a good  
4 point. Very well taken. Okay. It's now 8:30,  
5 8:32. The National Guard representatives will  
6 be available here in the building to answer any  
7 individual questions that you may have once we  
8 do adjourn.

9               Again, as I said, I want to thank you  
10 and the Air National Guard representatives for  
11 your fairness in participating during the  
12 meeting here this evening.

13              Please remember that you may also  
14 submit comments using the comment forms that I  
15 showed earlier and that were provided in your  
16 registration package. The scoping comment  
17 period is open until November 21, 1997.  
18 November 21, 1997, so there is time yet to make  
19 comments. I thank you, and good night.

20

21              (Whereupon, the public  
22 hearing was adjourned.)

23

24

25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

REPORTER'S CERTIFICATE

STATE OF WISCONSIN )  
COUNTY OF PORTAGE ) ss.

I, Amy L. Downs, do hereby certify the  
foregoing to be a true and correct transcription of my  
stenographic notes taken in this action.

Amy L. Downs  
AMY L. DOWNS  
Notary Public



# Written Comment Form

SEP 16 1997

## DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Robert L. Funnaker Jr

TITLE/ORGANIZATION: Legislator / HoChunk Nation

ADDRESS: 6750 Virginia Ct. Reedsburg, WI. 53959  
(Street) (City/State/Zip)

- COMMENTS -

I am opposed to the expansion of the hardwood  
Range.

} 1

Please hand this form to the staff, drop into the collection box, or mail to:  
Program Manager, Hardwood EIS  
Environmental Division  
Alt National Guard Readiness Center/CE/P  
3500 Fetchet Avenue  
Andrews AFB, MD 20762-5157

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

# Written Comment Form

SEP 16 1997

## RESPONSES TO COMMENTS

### DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Blaise A. Miller *if previous address: 212 Mary St Madison 53704*  
TITLE/ORGANIZATION: \_\_\_\_\_  
ADDRESS: 3559 Co. Hwy G Wisconsin Dells WI 53985  
(Street) (City/State/Zip)

#### - COMMENTS -

I'd like the Draft EIS to additionally address the environmental ecological and human impacts of CHAFF consisting of fine fibers of aluminum coated fiberglass which can be inhaled or ingested with unknown risk to human health.

Also I find it ridiculous that "none of the activities associated with the proposed action would have an impact on groundwater resources underlying the expanded range." I've been in that range for a long time and there is standing water everywhere it is a wetland and is therefore connected to groundwater resources.

I've also just learned that no data had study was done to identify receptor areas in the expansion area, yet on p. 2-58 the EIS in 3 paragraphs states various information to justify that there likely are none. If decisions are to be based on this non-existence, a detailed study by competent scientists should be relied upon.

I would also like to strongly state my frustration with the representation to the media that citizen opposition to the expansion has significantly diminished based on the number of requests for the 500 page EIS. I insisted on getting the actual copy rather than reading about the library because the only other option was to have my name removed from the mailing list. That was a deliberate ploy of the govt to

misrepresent and confuse things, and a 3rd option should have been given on that postcard we received to stay on an active list but not to receive the whole document.

Please hand this form to the staff, drop into the collection box, or mail to:  
Program Manager, Hardwood EIS  
Environmental Division  
Air National Guard Readiness Center/CEVP  
3500 Fletcher Avenue  
Andrews AFB, MD 20762-5157

#### Response to Comment No. 1

Chaff consists of very small fibers of aluminum-coated mica that reflect radar signals and, when dispensed from an aircraft, form a cloud that temporarily hides the aircraft from radar detection. Although the chaff may be ejected from an aircraft using a small pyrotechnic charge, the chaff itself is not explosive. Chaff is composed of silicon dioxide fibers ranging in diameter from 0.7 to 1 mil (thousandth of an inch), coated by an aluminum alloy and a slip coating of stearic acid (fat). Analyses of the materials comprising chaff indicate that they are generally non-toxic in the quantities used. Silicon dioxide is an abundant compound in nature that is prevalent in soils, rocks, and sands. The trace quantities of metals included in the mica fibers are not present in sufficient quantities to pose a health risk. Aluminum is one of the most abundant metals in the earth's crust, water, and air. In general, aluminum is regarded as non-toxic. Trace quantities of silicon, iron, copper, manganese, magnesium, zinc, vanadium, or titanium may be found in the alloy. The quantities involved are a minuscule percentage of levels that might cause concern. Stearic acid is found naturally as a glyceride in animal fat and some vegetable oils. Chaff has also been test-fired in a controlled environment to determine its potential to break down into respirable particulates, and the findings of the test detected no such result. The potential for chaff to affect soil and water is remote. Laboratory tests of chaff, using a modified toxic characteristics leaching procedure, indicated little or no potential for adverse effects on soil. No adverse impacts on biological resources have been identified. Based on their digestive processes, few animals are expected to suffer physical effects from chaff ingestion. Effects from inhalation are not considered a significant issue, since chaff particles would represent a small percentage of the particulates regularly inhaled by animals. Impacts on land use and visual resources are directly related to the visibility and accumulation of chaff debris. Field studies of the visibility of chaff and incidental debris in different environmental contexts concluded that significant aesthetic effects are unlikely.

00211W

Blaise

Miller

## RESPONSES TO COMMENTS

### **Response to Comment No. 2**

Background information discussing the geology and physiography of the area is provided in Subsection 3.5.1.1. This Subsection describes effects from the historic occurrence of the glacial lake, Lake Wisconsin, on the soils and geology of the area. Descriptions of groundwater resources in the area and baseline water quality are provided in Subsection 3.6.1.2. As discussed, the elevation of the shallow aquifer often raises above the ground surface level during periods of high precipitation, demonstrating that strong relationships exist between surface water and groundwater. Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsection 3.3.3.1 (Aircraft Mishaps), Subsection 3.3.4.1 (Munitions Use and Handling), and Subsection 3.4.1 (Hazardous Materials and Solid Waste). Potential impacts to both surface and groundwater resources and water quality are discussed in Subsections 4.6.2.1, 4.6.2.2 and 4.6.2.3. Based on the information provided in Section 3, adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. Subsection 4.5.2.3 (Water Quality) was modified to reference the identified appropriate sections in Section 3 and discuss conclusions regarding groundwater quality.

### **Response to Comment No. 3**

Such studies, if determined appropriate, would be accomplished with input on their necessity and coverage from the USFWS and the Wisconsin DNR.

### **Response to Comment No. 4**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

The munitions disposal site should be closed and remediated as soon as possible.

The draft EIS states no live ordnance is utilized at Hardwood, subsequently there is no apparent need for keeping this site open. The draft EIS reports: "One Defense Installation Restoration Project is located on the Hardwood Range. This site has been used since 1976 for annual burning and burial of spent munitions. A small plume of contaminated groundwater has been identified in that area. No monitoring is currently being performed at the site."

The characterization of the combustion products in the EIS is based on obsolete, incomplete information.

In an attempt to measure and identify emissions from the burning of propellants, Sandia National Lab recently conducted the so-called "Bang Box" tests. According to this report, emission factors from these tests included toxic and carcinogenic substances such as carbon monoxide, methane, benzene, 2,4 dinitrotoluene, 2,6 dinitrotoluene, and nitrogen oxides. Potential toxic emissions include lead, cadmium, and chromium - standard constituents of conventional propellants.

According to the *Overview of the Health Effects of Selected Munitions Chemicals* published by the USEPA and the Department of the Army, "DNT is classified B2 (probable human carcinogen) and thus a Lifetime HA is not recommended. The cancer potency is associated with hepatocellular and mammary gland carcinogenic activity in rats after 2,4-DNT treatment. 2,4-DNT also may be a promoter. There is some evidence which suggests that 2,6-DNT has both initiation and promotion activity and, therefore, may be a complete carcinogen."

The Army's *Health Risk Assessment for the Open Burn Facility at Badger Army Ammunition Plant* describes the incremental carcinogenic risk for exposure to DNT's from open burning of propellants. Of considerable concern are the multiple potential exposure pathways including inhalation, soil ingestion, dermal contact, and food ingestion and the increased and additive risks associated with each of these exposure pathways. Non-carcinogenic health risk are increased as well; toxic metals-contaminated ash, dispersed by open burning, exposes soldiers and nearby residents through inhalation, soil ingestion, dermal contact, and food ingestion. Other pollutants including NOx, CO, VOC's and TSP increase and compound risks to human health.

In addition to fire hazards, burning red phosphorus emits toxic fumes of oxides of phosphorus and can react with reducing materials.

The characterization of potential ecological, environmental and human health impacts of Titanium Tetrachloride in the draft EIS is incomplete, and therefore incorrect.

Titanium Tetrachloride is a colorless or light yellow, burning liquid with a pungent odor. Signal charges used in training ordnance at Hardwood reportedly each contain 17 cubic centimeters of titanium tetrachloride. The "smoke" described in the draft EIS is actually poisonous gases, according to the US Department of Health and Human Services (USDHHS) Toxicological Profiles. In a fire, poisonous emissions include titanium oxides and hydrochloric acid.

Titanium Tetrachloride is classified by the Department of Transportation and the US Environmental Protection Agency as a Hazardous Substance, and is on the Special Health Hazard Substance List because it is corrosive.

According to the USDHHS, breathing Titanium Tetrachloride can irritate the nose, throat and air passages, causing cough and phlegm. Repeated exposure can cause chronic bronchitis and may cause emphysema. Higher exposures can cause fluid in the lungs, a medical emergency, and even death. Skin contact can cause burns.

The USDHHS reports acute (short-term) ecological effects may include "the death of animals, birds, or fish, and death or low growth rate in plants. Acute effects are seen two to four days after animals or plants come in contact with a toxic chemical substance. Insufficient data are available to evaluate or predict the acute, short-term effects of Titanium Tetrachloride to aquatic life, plants, birds, or land animals."

Chronic toxic ecological effects may include shortened lifespan, reproductive problems, lower fertility, and changes in appearance or behavior. Chronic effects can be seen long after first exposure(s) to a toxic chemical. Insufficient data are available to evaluate or predict the chronic, long-term effects of Titanium Tetrachloride to aquatic life, plants, birds, or land animals.

For more information contact:  
Citizens for Safe Water Around Badger (608) 643-3124  
Coalition for Peaceful Skies (608) 435-6743 or (608) 269-2694

Dick Smith  
RR 4  
Sparta, WI 54656

7/10/97

SEP 16 1997

## WHY THE HARDWOOD RANGE EXPANSION IS STUPID!

"Construction and maintenance and bombing could possibly have the following effect on wetlands: altering groundwater discharge/recharge characteristics, reduced potential for filtering and treatment for water quality protection, reduced potential for attenuation and storage of stream and floodwater, loss of floral diversity, and loss of fishery and wildlife habitat."

Draft Environmental Impact Statement Addressing  
the Hardwood Range Expansion and Associated Airspace Action.  
Wisconsin Air National Guard, August 1997

Viable environmentally and economically superior alternatives were eliminated from consideration early in the EIS process and not carried forward for detailed study.

Utilizing electronic sending of simulated weapons delivery and increasing flight simulator training is actively and successfully used by the U.S. Air Force, contrary to statements in the draft EIS. These technologies are currently able to meet the "accuracy parameters" required by the USAF, contrary to the draft EIS.

Just last year, Kelly Air Force Base in San Antonio, Texas, installed a Unit Training Device (UTD) flight simulator. The UTD is one of 65 such units currently utilized by the USAF at bases across the nation. According to the UTD program manager for the Air Force, a "quality, full-mission trainer used to cost as much as the F-16 is simulated; now we are purchasing trainers for less than \$1 million each.

and experiencing a 95 percent cost reduction in comparison to traditional mission simulators."

The UTD simulator is used by the 182nd Fighter Squadron of the Texas Air National Guard's 149th Fighter Wing to train its F-16 pilots - the same aircraft used at the Hardwood Range - in emergency procedures, avionics, air-to-air and air-to-ground combat, and tactical fighting in a dense threat environment. According to the facility's press release, the Guard pilots are also able to practice acquiring and identifying targets and accurately delivering weapons in adverse weather conditions at day or night.

Unlike previous F-16 simulators, which have had to be housed in gymnasium-sized high bays, UTD trainers can be operated within a standard squadron office environment. While operating a traditional F-16 weapon system trainer in a specially designed facility has cost about \$50,000 a month, today individual UTD simulators can be operated for a fraction of the amount. The base reports these cost savings are being driven by a leap in computer technology that also has enabled UTD simulators to maintain a high degree of flight training realism.

The UTD program, the report concludes, began to take shape when the Air National Guard identified the need for a unit-level pilot trainer. At the time its units did not have simulators, which required aircrews to travel to distant Air Force bases where F-16 simulators were located.

The potential environmental, ecological and health impacts of using Chaff on public, private, and tribal lands were omitted from the EIS.

Chaff is an airborne radar-detection countermeasure consisting of extremely fine fibers of aluminum coated fiberglass. A typical burst Chaff bundle contains approximately 2.1 million human hair size fiberglass strands. After its dispersal and use in military training exercises it becomes a waste material that falls to the ground.

The use of chaff at Fallon Naval Air Station, Nellis Air Force Base, Mountain Home Air Force Base, and at military installations across the nation is a growing concern for rural residents. According to the Rural Alliance for Military Accountability (RAMA), rural residents and the Bureau of Land Management officials are finding clumps of chaff on public and private lands throughout central Nevada.

The Nevada Division of Environmental Protection noted two primary concerns. "The first concern is from inhalable particulate below PM10 which may occur from the decomposition and resuspension of fiber particulate by mechanical means. The Division's second concern deals with the physical deposition of what could be considered solid waste on public and private lands in the State of Nevada. There is very little information on the amounts of chaff currently deposited and how these fibers decompose in the environment." The Nevada Division of Environmental Protection concluded, "The Division does not feel that adequate studies have been done to assure that there are no environmental risks posed by the fibers."

The mechanical breakdown of these silicate fibers can be defined as asbestos-like, tiny filaments, and could, if inhaled or ingested, lodge in body tissue. The health risks associated with inhalation or ingestion have never been independently researched. According to Department of Defense studies, "The minimum dimension of a chaff fiber is 0.0003 inches, which converts to 7.6 micrometers. This is less than the 10 micrometer maximum size cutoff in EPA's standard for inhalable particulate." Moreover, the National Institute for Occupational Safety and Health (NIOSH) considers crystalline silica (as a respirable dust) "a potential human carcinogen."

The Air Force report *Identifying and Evaluating the Effects of Chaff from Military Aircraft* documented the lack of information on potential health risks, saying, "There is no documentation of human exposure studies to chaff." The report continued by noting, "Detailed authoritative data concerning the impact of chaff on land is lacking. The long-term effects of chaff are unknown."

The Army in 1992 concluded: "The potential of weathering fibers to respirable geometries in the environment and the potential exposure from resuspension of these fibers need to be determined to evaluate long-term risk and chronic exposure scenarios." The report continued, "Glass and carbon fibers and, likely iron fibers deposited on soils are susceptible to wind resuspension until immobilization occurs. However, even those fibers immobilized on soil surfaces can be resuspended by physical forces such as foot and/or vehicular traffic. Thus, there is a persistent risk of fiber inhalation and mitigation efforts will likely be required for areas containing high fiber concentrations."

The presence of extensive wetlands, together with a facility-wide shallow water table, eliminates the Hardwood site as a viable training area.

The draft EIS clearly states, "Extensive wetlands are located within the Hardwood Range, proposed expansion area, and Restricted Area R-6904A." (Page 3-38). Moreover, the EIS characterizes ordinance impact as "significant surface disturbance." And lastly, the EIS says construction and maintenance and bombing could effect wetlands by "altering groundwater discharge/recharge characteristics, reduced potential for filtering and treatment for water quality protection, reduced potential for attenuation and storage of storm and floodwater, loss of floral diversity, and loss of fishery and wildlife habitat."

One of the most insane statements in the entire draft EIS is on page 4-27: "None of the activities associated with the Proposed Action would have an impact on groundwater resources underlying the expanded Hardwood Range." As groundwater is hydrologically connected to adjacent wetlands, this would seem impossible.

The Watershed Protection Approach, as recognized by the USEPA, is "a management approach for more effectively protecting and restoring aquatic ecosystems and protecting human health. The EPA Office of Water is using this approach to focus on hydrologically defined resource areas, watersheds, and aquifers. The EWPA recognizes that water quality management must embrace human and ecosystem health and that managing for one without considering the other can be detrimental to both." (Emphasis added) (Source: *Watershed Protection: A Systems Approach*, EPA Office of Wetlands, Oceans and Watersheds, USEPA, August, 1995).

EPA Administration also supports this approach saying, "The EPA's overall goal is to prevent adverse effect to human health and the environment and protect the nation's groundwater resources in accord with federal laws. It will counter adverse effects (significant and reasonable risks) to the resource and the pollution in the near and long-term. Prevention is emphasized because groundwater cleanup is costly and difficult. Safe drinking water is the primary goal, along with the protection of interconnected surface water resources and ecosystems." (Source: *Protecting the Nation's Groundwater: EPA Strategy for the 1990s*, July 1991, Final Report of the EPA Ground Water Task Force).



---

**COMMENTS FROM PUBLIC MEETING HELD IN  
BLACK RIVER FALLS, WISCONSIN,  
SEPTEMBER 17, 1997**

1 AIR NATIONAL NATIONAL GUARD  
2 GUARD BUREAU

3

4

5

6

7 DRAFT ENVIRONMENTAL  
8 IMPACT STATEMENT ADDRESSING  
9 THE HARDWOOD RANGE  
10 EXPANSION AND ASSOCIATED  
11 AIRSPACE ACTIONS.

12

13

14

15

16 Date: September 17, 1997

17 Time: 7:00 p.m. - 8:45 p.m.

18 Location: Black River Falls Middle School  
19 Black River Falls, WI

20

21

22 PUBLIC FORUM

23

24

25

\* \* \*

26

27

28



1 TRANSCRIPT OF PUBLIC FORUM,  
2  
3

4 THE MODERATOR: Good evening ladies  
5 and gentlemen. Can you hear me in the back?  
6 Thank you for participating in tonight's meeting  
7 for the proposed Hardwood Range Expansion and  
8 Related Airspace Actions Draft Environmental  
9 Impact Statement. This meeting is part of the  
10 National Environmental Policy Act process. The  
11 purpose here is to seek your comments on the  
12 Draft Environmental Impact Statement for the  
13 proposed Hardwood Range Expansion and Associated  
14 Airspace Actions.

15 My name is Elmer Simonson. I am here  
16 tonight as your neutral moderator, and my goal  
17 here tonight is to ensure that each and every  
18 one of you has the opportunity to comment in a  
19 fair manner. To accomplish this, I ask that you  
20 please comply with a few ground rules.

21 First of all, you were given the  
22 opportunity to sign up to comment when you  
23 registered here tonight. I will call for  
24 comments from the sign-up list. If you did not  
25 previously sign up, but you would like to sign

GROSSBIER & ASSOCIATES, INC. 800-706-0691

1 up now, please raise your hand and you will be  
2 given a card to complete. If, at any time, you  
3 would like to sign up to comment this evening,  
4 feel free to go to the back of the room and pick  
5 up a sign-up card and fill it out and turn it in  
6 there, and it will get up to me.

7 Each person wishing to comment will be  
8 given five minutes to do so. I ask that you  
9 confine your comments to that time frame. When  
10 you have one minute left of your allotted time,  
11 I will signal that your time is almost up. At  
12 the end of the five minutes, I will then ask you  
13 to complete your comment.

14 Please be aware, however, that you  
15 also have the opportunity to write your comments  
16 on a blank written form such as the one I have  
17 here, and to submit that, or to submit a  
18 prepared statement to me, or send a statement to  
19 the mailing address that's on there. That's in  
20 the back of the room. You may go out of this  
21 room into the -- actually the dining facility  
22 right across the hallway, and there will be a  
23 court reporter there that can take your  
24 comments, if you so desire.

25 After everyone has commented, if time

1 is available, those wishing to make additional  
2 comments will be allowed to do so. I ask that  
3 there be no interruptions during the comments.  
4 It is only fair to you and the representatives  
5 from the Air National Guard that each person  
6 have the opportunity to complete their  
7 statements without interruption.

8 Our schedule then this evening is as  
9 follows: After I complete my remarks, a  
10 videotape outlining the proposals will be  
11 played. This tape is approximately nine minutes  
12 long. After this tape, I will call for your  
13 comments. We have a couple of introductions I'd  
14 like to make. Colonel Jim McMurry, the Volk  
15 Field commander is here.

16 The transcript of tonight's meeting is  
17 being reported by a court reporter, Cheryl  
18 Sisco. She's a court reporter with Grossbier &  
19 Associates out of Wisconsin Rapids. And the  
20 court reporter across the hall in the dining  
21 area is Amy Downs, also with Grossbier of  
22 Wisconsin Rapids. During the formal comment  
23 session, the court reporters may ask you to  
24 repeat information. Please assist those court  
25 reporters so that the Air National Guard can

GROSSBIER & ASSOCIATES, INC. 800-706-0691

1 have an accurate transcript of tonight's  
2 meeting. We will adjourn this meeting at  
3 approximately 9:00 p.m.

4 At this time then we will view a brief  
5 videotape outlining the proposals. I've been  
6 asked to make an administrative announcement  
7 that there is to be no food or drink brought  
8 into this auditorium.

9 (Whereupon the videotape  
10 was played.)  
11  
12

13 THE MODERATOR: It is now time for the  
14 official comment portion of the meeting. But,  
15 before I do that, I would like to recognize the  
16 presence of some dignitaries in the auditorium  
17 tonight representing some of our elected  
18 officials. When I call your name, I'd  
19 appreciate it if you would please stand. I  
20 understand that you don't care to make comments  
21 here tonight, but I wish that everyone knows  
22 that you're here.

23 First is Steve Piotrowski from Senator  
24 Herb Kohl's office. George Aldrich from Senator  
25 Russ Feingold's office. And Mark Aumann from

GROSSBIER & ASSOCIATES, INC. 800-706-0691

1 Congressman Ron Kind's office. I'll now call  
2 on you to make your comments. I ask that you  
3 come forward and use the microphone and stand to  
4 my left or in the forward part of auditorium.  
5 Please speak clearly into the microphone, and  
6 slowly, so that the court reporter can record  
7 your comments.

8 Again, as I said before, you will have  
9 five minutes to comment. As you begin, I ask  
10 that you state your name and address for the  
11 official record of this evening's meeting, and  
12 when you have one minute left of your allotted  
13 time, I will signal you. At the end of the five  
14 minutes, I'll ask you to complete your comment.  
15 Please remember, I ask that we have no  
16 interruptions during the comment period. First  
17 person to comment will be Jane Lewis, followed  
18 by Jenny Frost.

19  
20  
21 JANE LEWIS: My name is Jane Lewis. I  
22 live at 12572 - 189th Street in Jim Falls,  
23 Wisconsin. I grew up here in Black River  
24 Falls. I have many friends in the Army and the  
25 National Guard. I have many friends in the Army

## RESPONSES TO COMMENTS

7

1 and National Guard that served in the Gulf War.  
2 I know that war was successful largely because  
3 of the tremendous air power that was shown. And  
4 it was at that point in time that I realized how  
5 important the training was so that those  
6 missions could be run and held successfully.

7 Now, more than ever, it is important  
8 for the National Guard to have the best  
9 training. The National Guard is not the guards  
10 of ten years ago. The Guard is very active in  
11 world crisis, and that is going to continue on.  
12 So now, again, now, more than ever, the training  
13 is so very important.

14 It is clearly evident how important  
15 the National Guard is to our state with the  
16 number of natural disasters that have occurred  
17 here and plagued Wisconsin in the last few  
18 years. It's also clearly evident the important  
19 roll that the Guard plays in our national  
20 defense.

21 The Air Guard needs airspace to train  
22 effectively in. And I know that today the Air  
23 Guard, the Wisconsin Air Guard, is on missions  
24 all over the world that probably few of us even  
25 know about. And many of those missions are

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

8

1 dangerous. We're very, very fortunate to have a  
2 military that is volunteer. However, world  
3 events can change that drastically.

4 If you could put the shoe on the other  
5 foot and your loved one was in the military, I  
6 know that you would want to know that they had  
7 every opportunity, and not just every  
8 opportunity, but the best opportunity for  
9 training that were available to them. That is  
10 what I believe the Air Guard is asking for.  
11 They need every opportunity, and they need the  
12 best opportunity to train.

13 I know historically that Americans  
14 come together in times of crisis, and the Guard  
15 comes together in times of crisis. But the  
16 Guard needs to be prepared. The Guard needs to  
17 be fully trained. I believe that the Air Guard  
18 has been very proactive in trying to put to rest  
19 the concerns that the public has. And I really  
20 do believe that many of the concerns would be  
21 totally different if your loved one was in the  
22 military. You would want to know that they had  
23 every opportunity, that they had the best  
24 opportunities for training.

25 I have lived in an area where the Air

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 Guard has trained, and I lived there for many  
2 years. The kids and I always enjoyed watching  
3 the A10's and now the F16's fly by. I want to  
4 see that continue. I want to see that continue  
5 into the future. I do support the National  
6 Guard, and I really believe that if you could  
7 put the shoe on the other foot, that you would  
8 also support the National Guard today.

9 Sometimes I have a difficult time  
10 realizing that there's any opposition, but we're  
11 citizen soldiers. The Guard is citizen  
12 soldiers, and they're in the neighborhoods along  
13 with all of you, and they're here to serve  
14 Wisconsin. They're here to serve the nation.  
15 That's all I have to say. Thanks.

16 THE MODERATOR: Thank you for your  
17 comment. Our next commenter is Jenny Frost, and  
18 she will be followed by Pauline Evans.

19

20

21 JENNY FROST: My name is Jenny Frost.  
22 W13199 Trask Road, Black River Falls. I'm a  
23 life-long resident of Jackson County, and I'm  
24 here to support the expansion of the Hardwood  
25 Range and the Airspace. And I, too, as a child



## RESPONSES TO COMMENTS

10

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 would run outside to watch the planes go by, and  
2 we still do that with our family. And I'm real  
3 proud to say that we have one of the best  
4 training facilities in the country right at Volk  
5 Field, and I would like to see that continue.

1

6 I know how important it is for the  
7 National Guard to have the training as the Air  
8 Force, the National Guard is becoming such a big  
9 part of that. Now they're really becoming more  
10 in demand than ever before, and I want to know  
11 that my family and my friends and my military  
12 friends will be well protected when they're  
13 called upon to serve for our country.

14 And I think it's -- I wish people  
15 could really understand. You know, if you  
16 really have to be faced with a loved one going  
17 into a crisis situation like that, what it would  
18 feel like as a family member and wanting to know  
19 that they are going to be well protected and  
20 taken care of, and that our nation is going to  
21 be supported by such a good Air Force. So, I  
22 support the Hardwood Expansion. Thank you.

23 THE MODERATOR: Thank you for your  
24 comment. Pauline Evans, followed by Susan  
25 Ripple.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

0161IV

Jenny

Frost

## RESPONSES TO COMMENTS

11

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

PAULINE EVANS: I'm Pauline Evans.

Route 1, Viroqua, Wisconsin. My main concerns are wildlife. And with many species that are either threatened or endangered today, I think we have to consider protecting our wildlife. If we don't protect them, the Guard won't have anything to protect, it will be gone.

The DEIS seems to imply that there will be no adverse impacts on wildlife. Well, what about the DNR's conclusion that expansion would adversely affect the wolves in the area? And the DEIS also says that flight activity over the parks and wildlife areas would be restricted. Well, how much of this activity would be added to other areas if it's restricted there?

When General Beck briefed the Ho-Chunk legislators in January of 1996, he told them that he could not absolutely promise that the planes would never fly over the casino, senior citizens' area, and other places in the Nekoosa area. If this is true, what about the promises for the wildlife areas? Will they get more

1  
2  
3  
4

### Response to Comment No. 1

The ANG has been and will continue to work with the U.S. Fish and Wildlife Service, the Wisconsin Department of Natural Resources, and other regulatory agencies to exchange information and study the effects of their actions on threatened and endangered species within the areas affected by its operations. The ANG will continue this cooperative effort and adjust its operations should any information become available that would identify potential impacts on any threatened or endangered species or other wildlife.

### Response to Comment No. 2

The USFWS expressed concern that the development of ground-based facilities in the expansion area could potentially result in adverse effects to the gray wolf, but emphasized that insufficient data are currently available to make a determination. The EIS states that potential impacts to wildlife (including the gray wolf) would exist, but would generally be low with the implementation of specific mitigation measures. Subsection 4.8 of Volume I of this EIS addresses this issue in greater detail.

### Response to Comment No. 3

No change in existing limitations on flying activities over identified sensitive parks and wildlife areas, or in Restricted Airspace R6904A, will occur.

### Response to Comment No. 4

As the comment notes, General Slack did not promise that there would not be overflights of the Nekoosa area. Aircraft overflights of the Nekoosa area currently occur above 7,000 feet AGL. There should be no low-altitude overflights. The ANG is working with Fish & Wildlife and the Department of Natural Resources regarding avoidance of sensitive wildlife areas.

There may be an occasion that an aircraft inadvertently exceeds the boundaries of military training airspace and pass over or near sensitive areas such as Native American properties and wildlife areas. These are not planned events and the ANG works to avoid such occurrences.

1 activity than what they should have? That's my  
2 concern.

3 THE MODERATOR: Thank you for your  
4 comment. Susan Ripple, followed by Tom  
5 Lovejoy.

6  
7  
8 SUSAN RIPPLE: Good evening. My name  
9 is Susan Ripple. I'm living at 306 No. Wacouta,  
10 W-A-C-O-U-T-A, Street in Prairie du Chien,  
11 Wisconsin. I'm here not only as a private  
12 citizen, but as a representative of a grassroots  
13 citizen organization called Citizens United  
14 Against Low Level Flights. I'm the president of  
15 that organization presently.

16 Our group formed in February 1995 when  
17 we as individual citizens numbering near a  
18 thousand or more read in our local papers that  
19 the Air National Guard planned to establish two  
20 low level, low altitude jet training corridors  
21 over Iowa and Southwestern Wisconsin. We  
22 opposed that plan because in spite of the  
23 Guard's belief that the area was unpopulated,  
24 actually the areas were quite heavily populated  
25 with farmers and small towns.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

1           And we didn't feel it would be  
2       appropriate to have trainers, jets training at a  
3       couple hundred feet above the ground going four  
4       hundred, six hundred miles per hour over our  
5       area. We believe the political pressure that we  
6       brought to bear was what caused the Guard to, at  
7       least for now, withdraw that part of this plan  
8       which includes expanding the Hardwood Range.

9           We decided as a group that we also  
10      needed to oppose the expansion of the range, and  
11      that's why I'm here to comment at this hearing.  
12      We oppose the expansion of the range for a  
13      variety of reasons. Some of the reasons that  
14      are most meaningful for me are, I believe, that  
15      there are other options.

16           I believe in efficient government. I  
17      do not believe in taking seven thousand acres of  
18      beautiful Wisconsin wetland and destroying it,  
19      unless it's absolutely critical. I do believe,  
20      and I believe our members believe, in supporting  
21      the military and its need for appropriate  
22      training. We believe that there are other  
23      options for the pilots to acquire that  
24      training.

25           One of them which is quite important

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

14

1 to consider, which was not even considered  
2 except perhaps in the infant stage of this Draft  
3 Environmental Impact Statement, is the use of  
4 simulators. With the computer age and virtual  
5 reality, it is quite plausible for the military  
6 to purchase simulators which can allow jet  
7 pilots to get appropriate training, most of the  
8 training they need.

9 It works for the commercial airline  
10 industry which actually does use simulated  
11 flight for nearly a hundred percent of its  
12 training. And, of course, the commercial  
13 airline industry is concerned with safety as we  
14 all know with efficiency and with economy.

15 This is what we would like to see the  
16 military do. We simply do not believe that to  
17 get appropriate and safe training for our pilots  
18 it is necessary to take that seven thousand  
19 acres. We believe that there are other ranges  
20 which can be used. There's a much larger range,  
21 apparently near Kansas, and perhaps there are  
22 others which would be economical.

23 A problem that we have with the Draft  
24 Environmental Impact Statement at this point is  
25 that it don't give us any indication of cost of

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

The use of flight simulators for pilot training is already part of the training program for various aircraft using the affected airspace. The F-16 training regulation (AFI 11-F16) stipulates those activities that may be accomplished using simulators and those requiring actual flying. Although flight simulators work well for certain types of training (e.g., emergency procedures and instrument training), the complete substitution of simulator training for all flight training is not a viable alternative. In addition, the availability of simulators for on-going readiness training is limited.

### Response to Comment No. 3

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

### Response to Comment No. 4

Subsection 2.3.2 discusses the types of considerations that were a factor in determining which alternatives would be carried forward for detailed study in the EIS. Subsection 4.12 of the EIS discusses fiscal data related to socioeconomic impacts. While Federal expenditures for construction and maintenance of the range would benefit the local economy, there would also be a loss of some local revenues such as taxes and intergovernmental aid.

## RESPONSES TO COMMENTS

15

1 this expansion. None, whatsoever, of monetary  
2 costs. Yet the Guard's video, which was just  
3 shown, says -- actually mentions two reasons why  
4 the Guard believes that the taking of this seven  
5 thousand acres from Wood County is the most  
6 appropriate. One of those reasons is economic.

7 THE MODERATOR: One minute.

8 SUSANNE RIPPLE: Very vague as to  
9 reasons. The second reason that was listed in  
10 the video is quote, "the loss of an established  
11 base of local environmental issues." That  
12 reason I don't understand at all. I think it's  
13 an environmental disaster to take a beautiful,  
14 large piece of Wood County, Wisconsin land, and  
15 destroy it in the name of pilot training.

16 And we do believe in a strong and  
17 efficient military. I don't believe the word is  
18 in on what exactly caused Desert Storm to be a  
19 successful military engagement. There's a lot  
20 of controversy about the success of the pilot  
21 operations and the altitudes required for  
22 appropriate targeting there in the Mid East. So  
23 I don't think --

24 THE MODERATOR: Ma'am, could you bring  
25 your comment to a close, please?

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

16

1 SUSANNE RIPPLE: We're concerned,  
2 especially the Wood County Board is unanimously  
3 opposed to this proposal. Those are the elected  
4 officials of Wood County citizens. And we  
5 believe that their opinions should be respected  
6 by our government, that being the Air National  
7 Guard. Thank you.

6

8 THE MODERATOR: Thank you for your  
9 comment. Next commenter is Tom Lovejoy, and  
10 followed by Patricia Conway.

11  
12

13 TOM LOVEJOY: My name is Tom Lovejoy,  
14 and I'm an Environmental Analysis and  
15 Enforcement Supervisor with the West Central  
16 Region in the Wisconsin Department of Natural  
17 Resources in Eau Claire. I will speak tonight  
18 on behalf of the Department. I have a written  
19 statement. I'll just read it.

20 The Department currently has a number  
21 of staff from several programs reviewing the Air  
22 National Guard's Draft Environment Impact  
23 Statement, EIS. Programs involved in the review  
24 include: Forestry, fisheries management,  
25 wildlife management, parks and recreation, air

GROSSBIER & ASSOCIATES, INC. 800-706-0691

**Response to Comment No. 6**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

17

management, and endangered resources, solid and hazardous waste, water regulation, and aeronautics.

Our review will focus on the adequacy of the draft document and in addressing the issues, concerns, and questions raised by our letter dated March 22, 1995. In that letter, a copy of which is located in Appendix G of the Draft EIS, the Department identified sensitive resources in the study area, recommended topics of study, and outlined what we felt were important issues to be covered by the EIS.

As the document before us now is a draft, we anticipate that our review will identify those areas lacking and that are in need of additional information or clarification in the Final EIS.

Although our review has just begun, we have identified some important concerns. We continue to have concern about the proposed loss of over six thousand acres of Wood County Forest, and its effect on timber and wildlife management, and public outdoor recreation. The Draft EIS does not appear to include an analysis of the impacts associated with entering

1

2

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 1

Effects of the loss of Wood County Forest Land on land management and public recreation are discussed in Land Use Subsection 4.10 and in Socioeconomics Subsection 4.12 and Appendix I.

### Response to Comment No. 2

Timber and wildlife management in the Wood County forest generally would not change as a result of the proposed range expansion. Current wildlife management goals are compatible with proposed military use of the land. Access to some areas by managers may be periodically affected; however, access would be adequate for wildlife management activities to continue at current levels.

0198HV

Tom

Lovejoy



## RESPONSES TO COMMENTS

18

1 appropriate replacement lands into the county  
2 forest program to offset those proposed to be  
3 withdrawn for the expansion.

4 The Draft EIS also appears to lack  
5 sufficient details on the biological, chemical,  
6 and physical features of specific or approximate  
7 construction sites of proposed facilities such  
8 as target areas, landing strip, drop zone,  
9 service roads, and fire breaks. Such details  
10 are needed to determine the potential magnitude  
11 of environmental impacts to sensitive  
12 resources.

13 We expect to complete our review in  
14 November, and we will prepare a detailed written  
15 response to the Air National Guard at that  
16 time. Thank you.

17 THE MODERATOR: Please hold the  
18 comments. Please hold the applause. Thank  
19 you. Our next speaker is Patricia Conway,  
20 followed by J. D. Nichols.

21  
22  
23 PATRICIA CONWAY: My name is Patricia  
24 Conway. My address is Route 1, Box 220 Ontario  
25 54651. I went through this procedure last

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 3

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

### Response to Comment No. 4

The ANG firmly commits to not impact wetlands in development of the proposed expansion area. Best management practices would be employed to control soil erosion (i.e., vegetated buffer zones along streams and other sensitive features, use of silt fencing around construction sites, etc.) during construction of the tactical target complex, roads, landing zone, and drop zone, so erosion should be minimal. Much of the Hardwood Range, proposed expansion area, and surrounding areas are comprised of similar wetlands that would continue to function unimpeded at the regional level.

01/9/79

Tom

Lowrey

## RESPONSES TO COMMENTS

19

1 night, and I've divided my comments into three  
2 different sections because I'll also be speaking  
3 tomorrow night. I represent citizens opposed to  
4 range expansion and other environmental and  
5 citizens groups that oppose the bombing range.  
6 And it's an incredible experience to be involved  
7 in this process.

8 I certainly respect the opportunity  
9 that I have to make my comments tonight, but I  
10 really feel as though the PR job that is being  
11 done by the Guard here is almost overwhelming.  
12 It's certainly intimidating.

13 We have videos and we have booths and  
14 we have twenty-four different employees of the  
15 Air National Guard here as floaters and greeters  
16 and fielders and booth representatives. And  
17 it's -- it's just daunting sometime to have a  
18 few citizens coming and stating their opposition  
19 to this.

20 But what we have as citizens of  
21 Wisconsin is we have the law on our side. We  
22 have the statutes of Wisconsin. I brought along  
23 my book that has Statute 28.11 in it, and  
24 tonight I'd like to look at the legal situation  
25 around this whole question. Last night my

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 2

Section 28.11(1) of the Wisconsin Statutes does not specifically state that military use of county forestlands is authorized or prohibited. In the past, the Wisconsin Attorney General's Office has stated that lack of specific statements giving authorization is a shortfall. One Attorney General stated this could be remedied by "either legislative amendments or the expansion of existing military establishments." Clearly, the pursuit of the expansion is what is now being addressed. However, this prohibition against use does not stop the withdrawal of the lands from the County Forest Law Program and sale of the lands for range expansion. That decision will be based on the results of the environmental studies. If a decision is made to expand the range, the county and the Wisconsin's Department of Natural Resources will be involved in the withdrawal process.

## RESPONSES TO COMMENTS

20

1 comments were tendered around the Air National  
2 Guard's misrepresentation of the real need to  
3 expand the Hardwood Bombing Range.

4 They claim that the need is simply to  
5 improve the quality of training. The fact is  
6 that the Hardwood Range needs to expand or it  
7 will be required to close. And let's remember  
8 that closure means cleanup, and cleanup will  
9 cost millions and millions of dollars. The  
10 reason why the Range will have to close is  
11 because it right now is way too small to operate  
12 as a realistic training area.

13 Our own EIS the Guard sent out on Page  
14 215 says, realistic training for tactical  
15 aircraft requires a land area of at least seven  
16 miles by five miles range. As we have seen in  
17 the video tonight, that the actual land area of  
18 the Hardwood Range is a measly two miles by six  
19 miles. So with all of their Air Force  
20 instruction, all of their big requirement about  
21 realistic training, we're seeing that realistic  
22 training requires five miles by seven miles or  
23 thirty-five square miles. The existing range is  
24 two miles by six miles or twelve miles, twelve  
25 square miles.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 3

At this time, there are no plans, policies, or issues that would lead to the immediate closing or reduction in use of the Hardwood Range.

### Response to Comment No. 4

The term "requirements" means training can not be accomplished without having that item or training situation. The text will be revised for clarification. Experience has established a goal that ranges should be 7 miles by 5 miles in size to conduct optimum training. However, many types of training can be accomplished in smaller areas, though not as effectively as with a larger area.

## RESPONSES TO COMMENTS

21

1           So I believe that it's going to be a  
2       question of cleanup that we're trying to prevent  
3       here or avoid. It's either keep the Range open  
4       through expansion, or close it and clean it up.  
5       So this is a do or die kind of situation here.  
6       It has nothing to do with quality of training.  
7       It has to do with actually keeping the Range  
8       open.

9           Tonight, though, I want to look more  
10      at the legality of the existing range because no  
11      where in this particular DEIS does it mention  
12      that 3,400 acres of the existing bombing range  
13      are now presently still enrolled in the  
14      Wisconsin County Forest Program. So, as we  
15      speak, 3,400 acres of our state managed, state  
16      funded with all of our tax payer's dollars  
17      public forest, are being destroyed at the  
18      existing bombing range.

19           We have a written opinion of one of  
20      the top law firms in the country, the law firm  
21      of Dorsey and Whitney in Minneapolis who  
22      researched the history and legality of the  
23      Guard's use of those 3,400 acres of county  
24      forest land as a bombing range. And they say,  
25      quote, "Our independent analysis of the

### Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 6

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

22

1 Wisconsin law leads to the same conclusion, the  
2 Wisconsin Air National Guard's use of its forest  
3 land for military purposes has been, and  
4 continues to be, illegal."

5 In addition, Juneau County knew or  
6 should have known of this illegal use of its  
7 county forest land, and it thus improperly  
8 received state payments while this inconsistent  
9 use was continuing.

10 THE MODERATOR: One minute, ma'am.

11 PATRICIA CONWAY: So the Guard  
12 understood that they needed to withdraw this  
13 program in order to secure the existing  
14 county -- existing land that the Range is on.  
15 And their withdrawal was approved last spring by  
16 the DNR, and we have a lawsuit against that  
17 right now because the state law of Wisconsin  
18 says that you cannot withdraw county forest land  
19 from the county forest program unless it  
20 demonstrates a better and higher use.

21 And there's no way that we can imagine  
22 how taking our county forest land and using that  
23 as a bombing range could be construed to equal a  
24 better and higher use. So I'm not against  
25 defense, I'm not against proper training, but I

Response to Comment No. 7

See response to Comment No. 2.

## RESPONSES TO COMMENTS

23

1 don't think we need to trample on state laws of  
2 Wisconsin in order to train our pilots.

3 I think that there's a much bigger  
4 question here of state's rights versus the  
5 federal government coming in and imposing their  
6 will on the people, and insulting us by  
7 trampling on our state laws. I'll have more to  
8 say tomorrow.

9 THE MODERATOR: Thank you for your  
10 comment. J. D. Nichols.

11

12

13 J. D. NICHOLS: I'm J. D. Nichols. I  
14 live at 803 Pierce Street, Black River Falls  
15 54615. I'm here this evening as a civilian, as  
16 a tax payer, and as a resident of Jackson County  
17 and the State of Wisconsin. And I'm here to  
18 show my support for the Hardwood Range  
19 Expansion. As a member of the Army National  
20 Guard, I am aware of the importance of proper  
21 training facilities.

22 It may be hard for some of you to  
23 understand the importance of proper training.  
24 We're not talking about driver's education,  
25 preparing a sixteen year old to drive a car.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 8

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

8

## RESPONSES TO COMMENTS

24

1 We're talking about training citizen soldiers to  
2 perform life and death tactics required by our  
3 government. The United States has become the  
4 so-called peacekeeper of the world.

5 With more emphasis on the National  
6 Guard in this roll, we need to have training  
7 facilities that are adequate and accessible.  
8 These men and women have full-time jobs just as  
9 you do, and because of this, we cannot travel  
10 great distances to receive the necessary  
11 training. The Hardwood Range Expansion will  
12 allow the citizen soldier to receive the needed  
13 training. Thank you.

14 THE MODERATOR: Thank you for your  
15 comment. That is all of the cards that I have.  
16 Are there any others in the back of the room?  
17 You have one? Are there any other cards? Any  
18 other commenters that wish to participate. The  
19 next commenter then will be Dick Smith.

20

21

22 DICK SMITH: My name is Dick Smith,  
23 Route 4, Sparta, Wisconsin 54656. I am going to  
24 refer to this picture some, and I have the  
25 picture. I'll supply it for the record, which

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

25

1 is not the same thing, but very close to it.  
2 I'm not in the Guard. I don't have a contract  
3 for anything that's going to happen at Volk  
4 Field, but I support good training.

5 Good training must go by careful  
6 planning. You must have public scrutiny. You  
7 have to have a complete assessment as ordered by  
8 Congress. Several years ago the Air Force  
9 special use airspace needs and also of the  
10 expansion plans that they have were ordered to  
11 be put on the table so they could -- a  
12 Congressional committee could look at the  
13 Hardwood Bombing Range. Although this is has  
14 been studied for ten years, it was not even  
15 mentioned.

16 I notice there have been five crashes  
17 of Air Force craft in the last five days. If  
18 there were more public scrutiny, it would  
19 certainly save a lot of pain and lot of  
20 suffering on our Air Force right now. Call it  
21 friendly fire or accident, but I think that  
22 they're running amuck.

23 I don't think the FAA is doing it's  
24 job. FAA is supposed to be on board from the  
25 beginning in this process, and FAA does make the

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 2

The FAA is involved throughout any processes and is the administrative approval agency involving all airspace actions. All military training airspace addressed in this EIS currently exists.

04/2/14

Dick

Smith



## RESPONSES TO COMMENTS

26

1 decisions. When the Air Force wants something,  
2 they're supposed to go to the FAA, and the FAA  
3 is supposed to approve or unapprove. It seems  
4 to me that it's the other way around. Maybe  
5 it's because it has something to do with logic.

6 I think the dirtiest probably -- I  
7 don't know how -- perhaps the biggest loss is  
8 the arms industry. As I said last night in  
9 Mauston, we as citizens don't own the country  
10 munitions industry. It's all privately owned.  
11 In the last few years, Congress because they got  
12 all of this money from the armament industry,  
13 has given the Pentagon over thirty-five billion  
14 dollars more than they even wanted. This is  
15 wrong. This is entirely corrupt.

16 If we're going to cleanup campaign  
17 financing, this is probably where we should  
18 start. So public scrutiny is going to be the  
19 safest thing for the Air Force. And good  
20 training, not reckless training, where we find  
21 people flat hatting, doing crazy things and then  
22 dying because they got to take their airspace  
23 and pull shenanigans up in the air, fly  
24 underneath wires and short out a whole city.

25 What would happen if one of these big

3

### Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

27

1 transport planes full of fuel should crash and  
2 crash in Black River Falls, take the entire city  
3 with them? We have a Federal Facility  
4 Compliance Act passed in '92 concerning that  
5 stretch because that says that federal facility  
6 must comply with state law in regards to  
7 hazardous waste.

8 Behind me is a picture of the La  
9 Crosse River. Maybe you recognize it. Maybe  
10 you don't. This is where my grandfather's farm  
11 used to be. This was Wisconsin's finest cold  
12 water fishery, according to the Trout Unlimited  
13 National Executive Board. Now you can see what  
14 it is. Not only is the river itself, but about  
15 eight to a dozen small tributaries polluted and  
16 should technically be Super Funds by any state.  
17 But why is this exempt from Hazardous Waste  
18 Law?

19 Currently the munitions code is being  
20 considered and a lawsuit filed on behalf of it.  
21 I don't think any range expansion should go on  
22 until we have some rules to talk about hazardous  
23 waste. And this is an act of Congress. Until  
24 they have Hazardous Waste Laws on munitions in  
25 place, this should be put on hold.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 4

As discussed in Subsection 3.3.3 of the EIS, it is impossible to predict the location of any aircraft accident, should one occur. Furthermore, it is also impossible to predict the amount of physical or property damage, or the extent of any potential environmental contamination because these factors vary with every incident. Subsection 4.3 of Volume I of this EIS addresses this issue in greater detail.

### Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1           There's also a range rule, same  
2           situation. Until we have something to say when  
3           the Range as dirty as it is, where it should be  
4           cleaned up, well the Range is going to be  
5           closed. This should be put on hold until  
6           there's a range rule.

7           How can the state allow something like  
8           this to go on? Until we have laws in place to  
9           regulate, why is the residue and the poison from  
10          munitions considered a product yet?

11          THE MODERATOR: One minute, sir.

12          MR. SMITH: And as I said last night,  
13          I'll repeat it again, about training  
14          requirements. We have about a hundred pounds of  
15          training requirements. Air Force construction  
16          depends on money, what you want to call it when  
17          the Air Force wants something. They said these  
18          are training requirements. When we questioned  
19          one of them, they said, well, that's only Air  
20          Force construction. It's not really  
21          enforceable. Okay. I'm saying that training  
22          requirements don't have to be enforced either.  
23          And that's all for now.

24          THE MODERATOR: Thank you for your  
25          comment. Again, that's all of the cards that I

## RESPONSES TO COMMENTS

29

1 have at this time for commenters. Is there  
2 anyone else in the auditorium that wishes to  
3 comment at this time? The next commenter will  
4 be Jim Lewis.

5  
6  
7 JIM LEWIS: Good evening everyone.  
8 I'm Jim Lewis, 12572- 189th Street in Jim Falls,  
9 Wisconsin. I have a strong empathy with the  
10 citizens opposing this expansion, and that  
11 empathy is derived from my love for the  
12 outdoors. Bow hunting, gun hunting, fishing,  
13 cross-country skiing.

14 I also have a strong love for all of  
15 the freedoms we have in this country. We as  
16 citizens must balance our love for the  
17 environment and our love for our freedoms. It's  
18 easy to say let them train somewhere else, let  
19 them use simulators, or the whole thing is  
20 illegal. However, this training there is  
21 established.

22 It's been an extensively studied  
23 environmental alley. The seven thousand acres  
24 and the minimal environmental impact is a small  
25 price to pay for a trained pilot. My well-

1

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

GROSSBIER & ASSOCIATES, INC. 800-706-0691

02311V

Jim

Lewis

1 thought decision on this is to support the  
2 Hardwood Range Expansion and the Associated  
3 Airspace. Thank you.

4 THE MODERATOR: Thank you for your  
5 comment. Are there any other commenters at this  
6 time? If not, we'll take a fifteen minute  
7 break, and we'll reconvene at 8:05. During the  
8 time here that we're on break, there will be Air  
9 National Guardsmen available. Anybody who wants  
10 to speak to them directly about issues, feel  
11 free to do so. Yes, ma'am?

12 SUSANNE RIPPLE: Would you please  
13 repeat why we're reconvening? Why are we  
14 reconvening at 8:05? What's the purpose?

15 THE MODERATOR: I'm taking a fifteen  
16 minute break right now.

17 SUSANNE RIPPLE: In case there are  
18 more commenters?

19 THE MODERATOR: In case more come in.  
20 I said we would be open until 9:00 p.m.

21 SUSANNE RIPPLE: Thank you.

22 THE MODERATOR: If we don't have any  
23 comments, we'll close earlier. But at the time  
24 of break, we'd have a opportunity for others to  
25 come in.

1 (Whereupon a discussion was  
2 held off the record.)  
3  
4

5 THE MODERATOR: Ladies and gentlemen,  
6 we'll reconvene. Welcome back from the break.  
7 I don't have any more comment cards from new  
8 commenters. Are there any in the audience?  
9 New? Are there any new commenters in the  
10 audience? Evidently there are no new  
11 commentors.

12 I would ask at this time then since we  
13 do have some time left available, if anyone else  
14 in the auditorium wishes to make comments at  
15 this time? Yes. Okay. We'll stay by the five  
16 minute rule again, and come on up, again, state  
17 your name. I believe that one is on.  
18  
19

20 PATRICIA CONWAY: Again, my name is  
21 Pat Conway. My address is Route 1, Box 220,  
22 Ontario, Wisconsin 54651. I wanted to come up  
23 for my five minutes to enter into the record  
24 some documentation and discussion of how the Air  
25 National Guard to date has violated our state

GROSSBIER & ASSOCIATES, INC. 800-706-0691

1 laws with respect to the county forest land.  
 2 The DNR requested very directly, very  
 3 specifically that the Air National Guard address  
 4 the history of the bombing range in the EIS.  
 5 There is no history of the whole dilemma  
 6 starting out with an easement, and having it  
 7 erode into full scale use of the county forest  
 8 land.

1

9 And so I want to enter some of my --  
 10 some of these documents into the record because  
 11 I truly believe that this whole question is  
 12 going to come down to a couple of court cases.  
 13 And I truly believe that the people of Wisconsin  
 14 are going to prevail, and legally the Guard will  
 15 not be able to withdraw county forest land and  
 16 use it as a bombing range. And then it's going  
 17 to come down to a question of condemnation.

18 So to lay some ground work for these  
 19 law suits, I want to just explain the easement  
 20 that was originally granted to the Air National  
 21 Guard in 1954. It reads that it was okay to use  
 22 county forest land as long as it was used  
 23 exclusively as a safety area, which would now be  
 24 defined as footprints, weapons footprints. But  
 25 back in '54, they said for defense purposes.

## RESPONSES TO COMMENTS

Response to Comment No. 1

A complete history of the Hardwood Range would be inappropriate in the context of this EIS. An EIS is performed to assess current and projected actions. Although this may in fact be interesting and useful as background material, what historical information that is presented is of value to this particular EIS. Historical information can be obtained from Volk Field personnel, should the need for such information arise. In addition, general historic information for the study area and the Hardwood Range area is presented in Subsection 3.9 of Volume I.

## RESPONSES TO COMMENTS

33

1           We all want to be supportive of our  
2       military, and so we allowed county forest land  
3       to be used as a safety area, but no county  
4       forest land ever asked to be used as a target  
5       area. And that's right there in the easement.  
6       So, unfortunately, in 1980, the Guard determined  
7       that they needed to establish a target area,  
8       expansion of the target area on the county  
9       forest land, and they made a request to Juneau  
10      County.

11           And Juneau County asked the DNR, hey,  
12      would it be all right if we -- if we gave  
13      permission for the Air National Guard to take  
14      some of our county forest land and expand the  
15      target area, cut down the trees, and create a  
16      target area on county forest land. And this was  
17      the response of the DNR. This is dated April  
18      17, 1980. It's from Mr. Syd Hovde and it's to  
19      James Barrett, the chairman, Land, Forestry and  
20      Conservation Committee, Courthouse, Room 110,  
21      Mauston, Wisconsin.

22           Dear Jim: In reference to our  
23      telephone discussion regarding the expansion of  
24      target areas on Hardwood Range April 3, 1980.  
25      This request by Volk Field officials may

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

The request made by the ANG to Juneau County in 1980 was to accommodate the larger weapons footprint of the A-10 aircraft and also to enhance fire protection on the range. The land has since been withdrawn from the county forest land program and a new easement has been issued. There are no restrictions on where the ANG places its targets in the easement.



RESPONSES TO COMMENTS

34

1 constitute a violation of the County Forest Law  
2 as the development would be on county forest  
3 land. All targets now in operation are on lands  
4 owned by the State National Guard. The original  
5 easement executed by Juneau County did not  
6 attempt or did not anticipate targets on county  
7 forest land, and specifically allowed Juneau  
8 County to carry out their forestry operations.

9 Encroachment of targets upon the  
10 county forest descriptions would require a  
11 withdrawal proceeding and would violate the  
12 present easement. So this goes on, but it's --  
13 it's unbelievable to me that in 1980 the DNR  
14 would warn the National Guard that they had no  
15 business violating the agreement, that target  
16 areas could not be on county forest land.

17 I ask the DNR, what happened there?  
18 How come they did not enforce our state law that  
19 says you cannot have target areas on county  
20 forest land? And they forgot, that the people  
21 in the DNR right now didn't have any explanation  
22 for how this happened. I'd like to ask the  
23 Guard, how did this happen? Why, when this was  
24 brought to light, that the Guard could not  
25 extend target areas onto our protected county

GROSSBIER & ASSOCIATES, INC. 800-706-0691

1 forest land did they go ahead and do it anyway?

2 We have over two hundred acres right  
3 now of county forest land on the existing range  
4 that is cut down and consists of a target area.

5 THE MODERATOR: One minute.

6 PATRICIA CONWAY: Well, I think that  
7 that's sort of just an example of what we're  
8 looking at here. How they go down this slippery  
9 slope of starting with an easement to use as a  
10 safety area, and then target areas developed,  
11 and the whole encroachment, down to full scale  
12 use our own county forest land as a -- as a  
13 bombing range. And it was never intended for  
14 that.

15 And I think that in court we are going  
16 to prevail and demonstrate that the people of  
17 Wisconsin won't allow it. And then it will come  
18 down to a question of condemnation. We're  
19 hoping our public officials, Senator Feingold  
20 and Senator Kohl and Congressman Kind and the  
21 other Congressmen will stand behind the people  
22 of Wisconsin and not allow the federal  
23 government to condemn county forest land for  
24 expansion of the Range. That's all. See you  
25 tomorrow night.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

36

1 THE MODERATOR: Thank you for your  
2 comment. Are there any other commenters in the  
3 auditorium that wish to speak? Okay. Okay.

4  
5  
6 DICK SMITH: My name is Dick Smith.  
7 Route 4, Sparta, zip 54656. I just received  
8 this information before we came to the meeting.  
9 This is off the internet about some jet fuel  
10 getting into cranberry bogs in Massachusetts,  
11 and it look likes they may have damaged  
12 \$750,000.00 around and they claim the  
13 cranberries are damaged. They're about ready to  
14 be picked in a month or so, and they will never  
15 go to market.

16 And I'm saying that -- the reason I'm  
17 bringing this up is because this is also  
18 cranberry country, too, and I see south of the  
19 Range that they're using now the stream that, I  
20 think, feeds one cranberry bog that -- which was  
21 the highest producing bog in the state last  
22 year. It comes right next to a munition dump  
23 which is on the Range, which is contaminating  
24 the ground water. So I'm going to send this  
25 into the record because I don't have a copy of

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 1

The ammunitions dump was classified as a defense Installation Restoration Program (IRP) project site and has been remediated as a part of that program. The site has not been used for over 10 years. A 10-year monitoring study has been developed for this site. The Feasibility Study for this site was released in March 1998 for comment.

025:IV

Dick

Smith

## RESPONSES TO COMMENTS

37

1 it now.

2 In regards to selling land to  
3 military, you know, it's like cutting off your  
4 arm. You might get some money for it, but then  
5 you can't use it no more. I'm concerned  
6 about -- I know other withdrawals in other parts  
7 of the state that you -- if you want withdraw it  
8 and enter it out, you got to get two acres for  
9 every one. I don't see any discussion about  
10 that. And the Engle Act of 1957, I think, that  
11 wasn't mentioned in DEIS about the condemnation  
12 of taking land by the federal government. That  
13 they should mention it.

14 They should let us know that one  
15 process is that over five thousand acres has to  
16 go before an Act of Congress. And of course the  
17 Congress has to decide if they need it or not.

18 I also realize that flying over our sovereign  
19 nation, Indian Nation, to me without permission,  
20 it should be a Declaration of War. I don't  
21 think they can fly over unless they have  
22 permission to do it.

23 Recently, about a month ago, we all  
24 experienced super sonic booms in the State of  
25 Wisconsin. If you're outside, and I'm telling

### Response to Comment No. 2

This EIS process has been conducted to ensure that any real estate action involving over 1,000 acres has been scrutinized from an environmental perspective. Once this process is complete, a decision will be made at the DOD level on whether or not to pursue acquisition of any property. The Engle Act does not apply to the existing range because no Federal land is involved.

### Response to Comment No. 3

There are no Federal aviation regulations that specifically address overflights of Indian Reservations. All questions regarding airspace regulations should be directed to the FAA.

## RESPONSES TO COMMENTS

38

1 you now that an F16, that was not an F16, that  
2 was a SR71 or something. But F16 goes into  
3 super sonic speed quickly, very quickly. There  
4 should be more discussion about how many times  
5 this happens.

6 The day it happened at our place, I  
7 know we were all running around to see what blew  
8 up. I think millions of people did that that  
9 day that super sonic plane was playing up in the  
10 air. But I know they have to keep a log of  
11 this. I'd like to see a log in the record of  
12 how many times this happens out of Volk Field.

13 Now, the last thing I want to say is  
14 the sensitive area near the proposed expansion  
15 area is just as sensitive, if not more  
16 sensitive, than the business in Southern  
17 Wisconsin with the lower level flights where  
18 they're no longer at issue. These areas are the  
19 Crane Foundation, the Necedah Wildlife Refuge,  
20 perhaps to me they're more sensitive. So that  
21 if they're so sensitive down there as to stop  
22 flights, certainly we can -- expansion shouldn't  
23 go through up here either.

24 THE MODERATOR: One minute sir.

25 DICK SMITH: That's about all.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 4

Pilots are required to document supersonic flight at their unit of assignment. That information is available upon request by calling the unit to which the aircraft is assigned. Callers should document the date, time, and location of occurrence before calling the aircraft's home unit. Callers may also contact Volk Field Operations at (800) 972-8673.

### Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 THE MODERATOR: Thank you for your  
2 comment. Are there any other commenters in the  
3 audience that wish to be heard tonight? Yes.

4 JIM LEWIS: I'd like to speak again.

5 THE MODERATOR: Okay.  
6  
7

8 JIM LEWIS: Jim Lewis. 12572 - 189  
9 Street, Jim Falls, Wisconsin. The lady that  
10 spoke just before me a little bit ago, she used  
11 the term "unbelievable." And as I sit here, I  
12 find it unbelievable that we as citizens in this  
13 country are attempting to sue the very men and  
14 women that are out there trying to support this  
15 country. Thank you.

16 THE MODERATOR: Hold your applause,  
17 please.

18 DICK SMITH: Get a life.

19 THE MODERATOR: Is there any other  
20 commenters in the auditorium?

21 STEVE FIRKINS: Yeah, I will. Okay.  
22 Try to anyway.

23 THE MODERATOR: Use that microphone.  
24 Give your name and address.  
25

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

40

1  
2 STEVE FIRKINS: I'm Steven Firkins. I  
3 live at 703 Rose Street here in Black River  
4 Falls. Oh, boy. Kind of interesting being  
5 here. I guess I'm reminded about General  
6 Eisenhower how -- he's actually President  
7 Eisenhower for a long time. And before he left  
8 office as president, he made a warning about the  
9 expanding industrial -- military industrial  
10 complex, that there was something that didn't --  
11 that kind of worried him about that expanding  
12 military industrial complex. And he was  
13 involved in it quite heavily.

14 He was president over -- he was the  
15 big general over the whole complex, and he was  
16 worried about that. He warned us about that  
17 back in 1960, pretty famous comment speech.

18 Yeah. I worry about the expansion of  
19 the military and just the whole industrial  
20 complex thing. The mining interests are coming  
21 in, and suburbs are expanding, farm lands are  
22 expanding, malls and parking lots and roads, and  
23 everywhere man is -- the hand of man is touching  
24 everything all over, everything. There's hardly  
25 anything left that's untouched by mankind.

1

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1           And, yeah, that's kind of where we  
2     are. And I'm sad about that, but that's the way  
3     it is. It's a problem of population.  
4     Population expanding and interests, everyone's  
5     vital interests are competing with everyone  
6     else's vital interests.

7           And the wilderness area is dying.  
8     There's not much of it left any more. You know,  
9     what's a another three miles by six miles in the  
10    big scheme of things. It's probably not much,  
11    but there's not much of that pure stuff left any  
12    more. And it worries me, and I don't know what  
13    the answer is.

14           You know, I have my own kind of  
15    expansion in the population. I got three kids.  
16    I got needs to be met. I got my own greediness  
17    that I need to feed. You know, it worries me,  
18    myself, my own -- my own expansion of being a  
19    member of this planet here. But I think -- I  
20    don't know, I just feel sad about the way the  
21    things are these days.

22           I appreciate the military, you know,  
23    US military in many, many ways that's done good  
24    things. It's vital. It's a peacekeeper these  
25    days, and its role in history has been -- this



## RESPONSES TO COMMENTS

42

1 century has been to keep Germany and the Nazis  
2 from expanding, to keep Korea, North Korea from  
3 expanding, to keep Vietnam from expanding,  
4 Desert Storm, you know, and the Iraqis from  
5 expanding into Kuwaiti territory. Here in  
6 Bosnia they're acting as peacekeepers between  
7 the Croats and the Serbs from them, you know,  
8 fighting over lands and fighting, fighting and  
9 expanding.

10 All wars are kind of fought over lands  
11 and competition for lands, and that's what's  
12 happening here, you know. It's a little war  
13 between fighting over some land, some space,  
14 air, airspace, land. It's -- it's just kind of  
15 ironic about the military, you know, keeping  
16 other countries from expanding, but it wants to  
17 expand, too. And it's -- it's fighting. It  
18 sounds like there's some conflict with state  
19 interests and county interests and, you know,  
20 it's more fighting. It's competition over  
21 land.

22 THE MODERATOR: One minute, sir.

23 STEVE FIRKINS: I'm just sad. I don't  
24 know what the answers are. I'm just sad.  
25 That's all I can say. I don't know really what

-2

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 drew me to this place at this time. I saw a  
2 little ditty in the paper, and, well, what's  
3 this thing about. And I don't know, I'm just  
4 just sad, perplexed by it all. I don't know  
5 what the answers are.

6 I'm just worried. I'm worried like  
7 Mr. President General Eisenhower was back thirty  
8 some years ago, worried about expansion of this  
9 whole -- this whole thing, this whole -- you  
10 know, what is our responsibility as humans?  
11 Military, you know, there's some  
12 responsibilities there. We need to have a  
13 military that's a peacekeeper. And I guess, you  
14 know, that's what I'm here for, you know, as  
15 challenging how much expansion do we need, you  
16 know?

17 THE MODERATOR: I'd ask you to close  
18 your comment.

19 STEVE FIRKINS: I don't know. I'm  
20 just sad about it, wondering about it. I don't  
21 have any answers. I guess that's all I got to  
22 say about that. Thanks.

23 THE MODERATOR: Thank you for your  
24 comment. We do have another commenter. Troy  
25 Frost. Please state your name and address.

1 Five minutes, please.

2

3

4 TROY FROST: My name is Troy Frost,  
5 I'm a resident of Black River Falls area my  
6 whole life. I live at W13199 Trask Road just  
7 west of town here. I'm here tonight to speak in  
8 support of the Air National Guard and the  
9 proposed improvements they have for the Hardwood  
10 Range up by Finley. I think it's our -- it's  
11 our duty as citizens to support the men and  
12 women who have volunteered to defend and to  
13 serve our country.

14 I also think it's our responsibility  
15 to ensure that they receive the best possible  
16 training available, you know, now more than --  
17 the National Guard than all of our services.  
18 But now more than ever the National Guard is  
19 being asked to go all around the world and get  
20 involved with some of these world defenses and  
21 defend our country. And it's our responsibility  
22 to ensure that they have the training that they  
23 need to win, but most importantly to ensure that  
24 they get home safely.

25 And I have read a lot about the

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 expansion at Hardwood, and I believe that the  
2 training sites at Volk Field combined with the  
3 Hardwood Range and the improvements they have,  
4 that they're recommending for Hardwood Range,  
5 will provide the training that we need to ensure  
6 our pilots and airmen can do their job and come  
7 home safely. Thanks.

8 THE MODERATOR: Thank you for your  
9 comment. That completes all of the cards that I  
10 have here for commenters. Are there any other  
11 individuals in the audience that wish to  
12 comment? Are there any other individuals that  
13 wish to comment? Hearing none, we are a little  
14 ahead of our scheduled adjournment time. It's  
15 about 8:30. We will adjourn.

16 The Air National Guard representatives  
17 will be available here yet in the auditorium or  
18 in the dining hall area to answer any individual  
19 questions that you may have once we do adjourn.  
20 And for your information, I would like to inform  
21 you that your comments here tonight, as well as  
22 last night, and again tomorrow night, will be  
23 recorded and responded to in the Final  
24 Environmental Impact Statement when it is made  
25 available.

1 I thank you and the Air National Guard  
2 representatives for your fairness in  
3 participating during this meeting this evening.  
4 Please remember, again, that you may also  
5 comment using the comment forms that were  
6 provided to you in the registration package.  
7 The comment period is open until November 21,  
8 1997. Thank you for your participate and your  
9 cooperation here tonight. Good night.

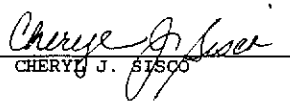
10 (Whereupon the Public Forum  
11 was terminated.)  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## REPORTER'S CERTIFICATE

STATE OF WISCONSIN )  
                          ) ss.  
COUNTY OF WOOD       )

I, Cheryl J. Sisco, do hereby  
certify the foregoing to be a true and correct  
transcription of my stenographic notes taken in this  
action.

  
CHERYL J. SISCO

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Brian Jensen  
Rt 1 Box 17  
Black River Falls, WI

SEP 17 1997

September 17, 1997

I'm in favor of increasing the usage and  
improving the range to better accommodate our  
pilots. ] 1

SEP 17 1997

DONALD J. KROHN - 340 Tyler Avenue - Port Edwards, Wisconsin 54469  
September 17, 1997

Commanding General  
Wisconsin Air National Guard

My name is Don Krohn. I am a resident of the village of Port Edwards, Wood County, State of Wisconsin.

I am absolutely opposed to the expansion of the Hardwood Range in Wood County.

I am convinced that this expansion will greatly increase the noise pollution as well as be extremely detrimental to the wild life of the area. I feel that there are other, more isolated areas, that would better serve your training purposes.

I have experienced first hand many instances of extremely loud fly over noise by your jets, including a couple of sonic booms that rocked my cabin in nearby Adams County.

In this time of cutbacks in military spending I am also not convinced that buying a cranberry farm which is valued well in excess of three million dollars is a prudent use of my tax dollars.

If you decide to go ahead with this project in spite of the almost unanimous local opposition, I will contact my federal and state elected officials and ask them to not allow the spending for this project.

Some local people have the opinion that if "the government wants the land, they will take it." WRONG! Your mission is to protect all of the U.S. citizens, including their constitutional rights. If the majority of people oppose this project, it should not be built.

Sincerely,

  
Don Krohn

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Noise from aircraft operations contributes to the overall noise exposure on the environment generally referred to as "noise pollution." Military aircraft operations are part of this exposure. The means to measure or model noise levels according to industry accepted standards exists. This EIS provides an evaluation of the noise levels associated with military aircraft operations. These levels, when combined with other sources of noise within the environment, contribute to "noise pollution."

Studies conducted on wildlife have shown that numerous wildlife species have the ability to adapt to the presence of man and various man-made sound sources, including jet aircraft noise. While the noise generated from low-altitude military overflights may be initially startling, habituation to jet aircraft noise occurs with most wildlife species. Species-specific responses to low-altitude overflights vary considerably, and responses from individual animals may have the potential to cause injury. However, wildlife populations are usually affected only when a variety of factors work in combination to impact them, including declines or fluctuations in the availability of a food source, habitat destruction or alteration, predation, hunting, trapping, poaching, disease, or inclement weather, rather than noise alone. Normally it would be unrealistic to predict or attribute any wildlife population declines to a single stressor, such as noise. In addition, no published scientific evidence was identified that indicated harm may occur to wildlife as a result of exposure to the levels of noise generated by military aircraft that would utilize the airspace associated with the Hardwood Range.

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



## RESPONSES TO COMMENTS

### Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

---

**COMMENTS FROM PUBLIC MEETING HELD IN  
WISCONSIN RAPIDS, WISCONSIN,  
SEPTEMBER 18, 1997**

1 AIR NATIONAL NATIONAL GUARD  
2 GUARD BUREAU

3

4

5

6

7 DRAFT ENVIRONMENTAL  
8 IMPACT STATEMENT ADDRESSING  
9 THE HARDWOOD RANGE  
10 EXPANSION AND ASSOCIATED  
11 AIRSPACE ACTIONS.

9

10

11

12

13

14 Date: September 18, 1997

15 Time: 7:00 p.m. - 9:00 p.m.

16 Location: West Junior High  
17 Wisconsin Rapids, WI

17

18

19 PUBLIC FORUM

20

21

\* \* \*

22

23

24

25

## TRANSCRIPT OF PUBLIC FORUM,

THE MODERATOR: Good evening ladies and gentlemen. Thank you for participating in tonight's meeting, for the proposed Hardwood Range Expansion and Related Airspace Actions Draft Environmental Impact Statement. This meeting is a part of the National Environmental Policy Act process. The purpose of this meeting is to seek your comments on this draft of the Environmental Impact Statement which describes in detail the proposed Hardwood Range changes.

My name is Elmer Simonson. I'm your neutral moderator this evening. My goal tonight is ensure that each and every one of you has the opportunity to comment in a fair manner. To accomplish this, I ask if you please comply with a few ground rules.

First of all, you were given the opportunity to sign up to comment when you registered here tonight. I will call for comments from the sign-up cards that are presented to me. If you did not previously sign up but would like to do so now, please raise

GROSSBIER & ASSOCIATES, INC. 800-706-0691

1 your hand and a staff member will give you a  
2 card to complete. If, at any time, you would  
3 like to sign up to comment this evening, the  
4 sign-up cards will be located in the back of  
5 this auditorium with a staff member.

6 Each person wishing to comment will be  
7 given five minutes to do so. I ask that you  
8 confine your comments to that time frame. When  
9 you have one minute left of your allotted time,  
10 I will signal you that your time is almost  
11 finished. At the end of the five minutes, I  
12 will then ask you to complete your comment.

13 Please be aware, however, that you  
14 also have the opportunity to write your comments  
15 on and an established written comment form.  
16 That's a large white sheet that's in your  
17 packet, looks like this. That comment form may  
18 be handed to the -- a staff member or to myself,  
19 dropped in a collection box, or mailed to the  
20 address that's shown on the bottom of the form  
21 itself.

22 Another option available to you is to  
23 go into the next room, out in the area where you  
24 entered the building, and there is a court  
25 reporter located there. If you prefer to have a

1 more private setting, you may give your  
2 statement to that person. She will be available  
3 throughout the course of this open meeting.

4 After everyone has commented, if time  
5 is available, those wishing to make additional  
6 comments will be allowed to do so. I ask that  
7 there be no interruptions of any kind before,  
8 during, or after the comments. It is only fair  
9 to you and to the representatives of the Air  
10 National Guard that each person have the  
11 opportunity to complete their statements without  
12 interruption.

13 Our schedule this evening is as  
14 follows: After I complete my remarks, a  
15 videotape outlining the proposals will be  
16 played. This tape is approximately nine minutes  
17 long. After this tape, I then will call for  
18 comments. A transcript of tonight's meeting is  
19 being recorded by Cheryl Sisco, a court reporter  
20 from Grossbier & Associates from right here in  
21 Wisconsin Rapids. As I said, in the room that  
22 you came into when you first entered the  
23 building, another court reporter, Karen  
24 Grossbier, also, of course, from Grossbier &  
25 Associates, is available to take your comments

GROSSBIER & ASSOCIATES, INC. 800-706-0691

1 there.

2 During the formal comment session, the  
3 court reporters may ask you to slow your  
4 presentation or to repeat information. Please  
5 assist the court reporters so that the Air  
6 National Guard can have a complete and accurate  
7 transcript of tonight's meeting.

8 For your information, the comment  
9 period is open until November 21 of 1997. And  
10 also for your information, your comments will be  
11 reported as is required by the Environmental  
12 Impact Statement process. And a response to  
13 your comments will be made in the Final  
14 Environmental Impact Statement when it becomes  
15 available.

16 We will plan to adjourn this evening  
17 at approximately 9:00 p.m. Before showing the  
18 video, I wish to introduce the commander of Volk  
19 Field, Colonel Jim McMurtry. Would you please  
20 stand and be recognized? Thank you. At this  
21 time, we'll view the videotape outlining the  
22 proposals.

23 (Whereupon the videotape  
24 was presented.)

25

1  
2 THE MODERATOR: It is now time for the  
3 official comment portion of the meeting. I  
4 would first like to introduce to you our elected  
5 officials that are here with us tonight.  
6 Representing Senator Russell Feingold is George  
7 Aldrich. Would you please stand? And  
8 representing Senator Herb Kohl is Steve  
9 Piotrowski. Please stand. It's my  
10 understanding you're not going to comment right  
11 now.

12 And the first elected official that's  
13 here tonight is Louis Rosandick from the Wood  
14 County Board of Supervisors. And I would ask  
15 that if he wishes to comment, that he would do  
16 so at this time, please. Come up to the mike  
17 over here, please. When you get to the mike,  
18 I'd ask that if you please speak slowly and  
19 clearly into the microphone.

20 Again as I said before, each will have  
21 five minutes to comment. And as you begin,  
22 please state your name and address for the  
23 official record of this evening's meeting. When  
24 you have about one minute left of your allotted  
25 time, I will signal you. And at the end of the

GROSSBIER & ASSOCIATES, INC. 800-706-0691



## RESPONSES TO COMMENTS

7

1 five minutes, if you have not completed, I'll  
2 ask you to complete your comment.

3 Please remember, I ask that we have no  
4 interruptions during this comment period. Sir.

5

6

7 LOUIS ROSANDICK: Thank you. Is this  
8 mike on? Okay. Thank you. My comments are  
9 taken primarily from the Draft Impact Statement  
10 that was mentioned in the video, and I will  
11 comment according to the pages that were in the  
12 book.

13 First of all, there was on Page 1,  
14 Section 1, Page 12, summary of major issues  
15 identified. And it was my feeling that there  
16 was not enough emphasis placed on the flights of  
17 the Marshfield Hospital helicopter. There were  
18 other concerns, but to us, that is very  
19 important in our Central Wisconsin area.

20 Boy, is that a tremendous feedback.  
21 Can you correct that? Should I stand back? Can  
22 you hear me now? Okay. Thank you.

23 The concern of the flights from  
24 Marshfield of the helicopter, and this in the  
25 Draft Impact Statement, was covered very

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 1

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

029414

Louise

Rosandick

## RESPONSES TO COMMENTS

8

1 lightly. In fact, not mentioned at all. And in  
2 our area, the media covered it very well. It is  
3 of great concern to us.

4 And I know from seeing the flights  
5 from my deer stand where I hunt deer, the Spirit  
6 of Marshfield flies right over the area there.  
7 And after deer hunting in that same area, the  
8 jets fly over, probably at the same altitude.  
9 And I don't think you'd measure it in miles, you  
10 probably would measure it in feet the distance  
11 of height of the two aircraft. So that is of  
12 great concern to us, and we think it should be  
13 addressed to a greater extent by the group.

14 On Page 2, one overview of  
15 alternatives, the one that I liked was close the  
16 Hardwood Range and redirect units to other  
17 ranges. Or if it is expanded, if we look at our  
18 area, we have a tremendous amount of federal  
19 lands immediately to our west which are  
20 uninhabited. And, according to what we have  
21 learned thus far, the farmland is mostly wooded  
22 area. And as far as population, it's almost nil  
23 in that area. So there will be very little  
24 disturbance in that area if the range were  
25 expanded in that direction.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

At this time, there are no plans, policies, or issues that would lead to the immediate closing or reduction in use of the Hardwood Range.

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

## RESPONSES TO COMMENTS

1 And there are other areas, I'm sure,  
2 in the Mid West that would welcome you. I am  
3 somewhat acquainted in the Upper Penninsula of  
4 Michigan, and I know the folks in the area of  
5 the Sawyer Air Force Base would most heartily  
6 welcome this group up in that area.

7 On Page 2, Section 2, Page 34, I  
8 question the statement of, noise levels  
9 associated with aircraft operation in the ammo  
10 aids are quite low overall when compared to  
11 generally accepted standards. I disagree  
12 totally because I have been in the field on a  
13 farm visiting with farmers when those jets fly  
14 over. We just stop talking, and I wish we could  
15 assimilate that noise in hear this evening to  
16 see how loud it really is. So the statement  
17 that they're quite low overall, that one I just  
18 I don't agree with at all.

19 Then also, Wood County residents  
20 really have too much to lose if the land area is  
21 expanded. We would lose nearly seventeen  
22 percent of our county forests, and we also lose  
23 hunting land. Cranberry marshes would be  
24 affected, snowmobile trails, hiking trails,  
25 fishing area, roads.

-3

-4

**Response to Comment No. 3**

The approach used to provide noise analyses in the EIS has been specifically tailored to analyses of military aircraft operations. The Federal Interagency Committee on Noise (FICON), representing a variety of Federal agencies with a mix of concerns associated with aircraft noise, reviewed aircraft noise analyses issues in 1992. The committee's report (FICON 1992) continued an approach to evaluating relative impacts associated with aircraft noise that has been recognized by noise analysis experts as the most widely endorsed and comprehensive approach to aircraft noise analysis available. This approach to noise analysis was incorporated into the analyses associated with the Draft EIS. In general, Federal land use compatibility criteria are derivatives of guidelines first devised for land near airports. All land use compatibility is based on the use of Day-Night Average Sound Level (abbreviated as DNL or Ldn) as the descriptor representing community noise environments. The criteria treat areas below DNL 65 dB as compatible for all uses, including residential, and they treat DNL 65 dB as a threshold for significant exposure. There is no generally accepted method for treating rural areas differently for these purposes.

However, many persons, including some members of the Federal regulatory community, feel that to assess rural areas with more quiet ambient noise conditions, the application of FICON standards only, and the 65 dB threshold, is inadequate. Consequently, the use of the 65 dB threshold is presented in combination with Sound Exposure Level (SEL) information to provide the necessary additional information to evaluate potential impacts.

**Response to Comment No. 4**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

10

1           And I know in one of our discussions  
2       with people from the Air National Guard the  
3       comment was made well we have to travel too far  
4       if we were to go to say Sawyer Air Base. No one  
5       ever asked us how far will our people have to  
6       travel to go fishing? How far will they have to  
7       travel to go hunting? How far will they have to  
8       travel to go snowmobiling? All of that would be  
9       added expense to the people in Central Wisconsin  
10      area.

5

11           And also lastly in that area,  
12      aesthetic values. All that noise and we  
13      wouldn't have the opportunity to go and hike and  
14      enjoy the outdoors that we do here in Central  
15      Wisconsin.

6

16           Then also, if we were to lose this  
17      land, it will be almost impossible for to us  
18      replace it. We already tried it when we first  
19      heard this was going to happen, and anybody here  
20      from the Town of Cary knows what happened. We  
21      were up in that area to look at land to replace,  
22      and we really met a hornets nest there. And we  
23      were, needless to say, not very welcome. We  
24      know now it would be almost next to impossible  
25      to replace the six or seven thousand acres that

### Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 6

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

Response to Comment No. 7

Effects of the range expansion on timber sale revenues are discussed in Subsection 4.12 of the EIS and in Appendix I.

1 we are talking about.

2 So there is a great concern there  
3 because we wouldn't have the land available.

4 THE MODERATOR: One minute, sir.

5 LOUIS ROSANDICK: Okay. Thank you.

6 And another concern would be the forest profit  
7 income. I am sure that probably will be  
8 referred to at later comments. So that is my  
9 comment for the evening, and I thank you.

7

10 THE MODERATOR: Thank you for your  
11 comment. Please hold your applause. Please, as  
12 I asked before, we'll hold it. No applause.  
13 The next speaker is Terry McKnight, and he'll be  
14 followed by Amos Miller.

15  
16  
17 TERRY MCKNIGHT: Good evening. My  
18 name is Terry McKnight. I'm an Environmental  
19 Review Coordinator with the Wisconsin Department  
20 of Natural Resources. I speak tonight on behalf  
21 of the Department. The Department currently has  
22 a number of staff from several programs  
23 reviewing the Air National Guard's Draft  
24 Environmental Impact Statement.

25 My name is Terry McKnight, I'm an

1 Environmental Review Coordinator with the  
2 Department, Wisconsin Department of Natural  
3 Resources. I speak on behalf of the Department  
4 tonight.

5 The Department currently has a number  
6 of staff from several programs reviewing the Air  
7 National Guard's Draft Environmental Impact  
8 Statement. Programs involved in the review  
9 include: Forestry, fisheries management,  
10 wildlife management, parks and recreation, air  
11 management, endangered resources, solid and  
12 hazardous waste, water regulation, and  
13 aeronautics.

14 Our review will focus on the adequacy  
15 of the draft document in addressing the issues,  
16 concerns, and questions raised by our letter  
17 dated March 22, 1995. In that letter, a copy of  
18 which is located in Appendix G of the Draft EIS,  
19 the Department identified sensitive resources in  
20 the study area, recommended topics of study, and  
21 outlined what we felt were important issues to  
22 be covered by the EIS.

23 As the document before us now is a  
24 draft, we anticipate that our review will  
25 identify those areas lacking, and that are in

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## RESPONSES TO COMMENTS

13

1 need of additional information or clarification  
2 in the Final EIS.

3 Although our review has just begun, we  
4 have identified some important concerns. We  
5 continue to have concern about the proposed loss  
6 of over six thousand acres of the Wood County  
7 Forest and its effect on timber and wildlife  
8 management and public outdoor recreation.

9 Also, the Draft EIS does not appear to  
10 include an analysis of the impacts associated  
11 with entering appropriate replacement lands into  
12 the county forest program to offset those  
13 proposed to be withdrawn for the expansion. The  
14 Draft EIS also appears to lack sufficient  
15 details on biological, chemical, and physical  
16 features of specific or approximate construction  
17 sites of proposed facilities such as target  
18 areas, landing strip, drop zone, service roads  
19 and fire breaks. Such details are needed to  
20 determine the potential magnitude of  
21 environmental impacts to sensitive resources.

22 We expect to complete our review in  
23 November, and we will prepare a detailed written  
24 response to the Air National Guard. Thank you.

25 THE MODERATOR: Thank you for your

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 1

Effects of the loss of Wood County Forest Land on land management and public recreation are discussed in Land Use Subsection 4.10 and in Socioeconomics Subsection 4.12 and Appendix I.

### Response to Comment No. 2

Timber and wildlife management in the Wood County forest generally would not change as a result of the proposed range expansion. Current wildlife management goals are compatible with proposed military use of the land. Access to some areas by managers may be periodically affected; however, access would be adequate for wildlife management activities to continue at current levels.

### Response to Comment No. 3

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

### Response to Comment No. 4

The ANG firmly commits to not impact wetlands in development of the proposed expansion area. Best management practices would be employed to control soil erosion (i.e., vegetated buffer zones along streams and other sensitive features, use of silt fencing around construction sites, etc.) during construction of the tactical target complex, roads, landing zone, and drop zone, so erosion should be minimal. Much of the Hardwood Range, proposed expansion area, and surrounding areas are comprised of similar wetlands that would continue to function unimpeded at the regional level.

G3011V

Terry

Mc Knight

## RESPONSES TO COMMENTS

14

1 comment. I'll leave my mike off to try to cut  
2 down on the feedback. The next commenter is  
3 Amos Miller, followed by Mary Jocham.

4  
5  
6 AMOS MILLER: First of all, I want to  
7 thank you Senator Herb Kohl and Senator Russell  
8 Feingold for getting extensions on our comment  
9 periods, and also for holding -- helping us to  
10 obtain and have these hearings held Mauston,  
11 Wisconsin Rapids, and I fail to recall which one  
12 that was last night.

13 My name is Amos Miller. I'm from  
14 Westby, Wisconsin, and I'm here representing  
15 Citizens United Against Low Level Flights,  
16 Vernon County, Crawford County, Richland County,  
17 Iowa County, into Iowa. Citizens United Against  
18 Low Level Flights was a citizen group, you know,  
19 gathering sort of responding to the Draft or the  
20 D.O.P.A. Excuse me, I'm a little nervous here.

21 Humans, cattle, horses, we all hear  
22 the noises when airplanes fly over. The draft  
23 explains that over the course of -- over the  
24 course of twenty-four hour period, the noise  
25 level that we will experience will be

1

### Response to Comment No. 1

The procedures used to determine aircraft noise exposure and its results represent the best available technology and industry accepted methods. All aircraft operations presently occurring, and proposed to occur were considered. Noise was computed using the Air Force's MR\_NMAP software, which bases its calculations on the same physical principles used for aircraft noise analysis throughout the world, and was specifically validated for military airspace operations. Data incorporated into the Air Force's noise models are widely accepted by the scientific community, and the Air Force regularly participates in various scientific organizations to ensure that the best available data and methods are used.



## RESPONSES TO COMMENTS

15

1 acceptable. But a hundred decibels at a path  
2 direct overpass, you know, is quite high. And  
3 according to the DEIS, the noise level would be  
4 acceptable.

5 Our question is, we question the model  
6 that was used to assess noise levels, and we  
7 feel that the noise levels would be not  
8 acceptable. You know, the Wood County Board is  
9 being asked to give up over six thousand  
10 continuous acres of forest land for the bombing  
11 range expansion.

12 The Department of Natural Resources  
13 insists the Wood County Board substitute  
14 comparable land for the county forest land that  
15 would be given up. The new land would be in  
16 small parcels scattered all over the country.  
17 Will bow hunters, hikers, and others find small  
18 scattered parcels of land equivalent to a single  
19 portion of over six thousand acres of forest  
20 land? Irreplaceable. And small parcels will  
21 not replace it.

22 The Wood County Board continues to  
23 oppose turning over the land, unanimously. The  
24 overwhelming majority of letters written to  
25 legislators and to the Guard concerning the EIS

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

## RESPONSES TO COMMENTS

16

1 opposing expansion. Do our opinions matter or  
2 does the Guard -- are we represented in the  
3 Guard as well? Does Wood County Board  
4 opposition matter?

5 In the Draft Environmental Impact  
6 Statement, the Guard presents an assessment of  
7 the number of aircraft that will fly in the  
8 area, but we see in the past assessments have  
9 been basically under predicted by four to five  
10 times. Are these latest assessments any more  
11 reliable than the ones in the past that were  
12 unreliable?

13 The low level corridors that were  
14 proposed for the south and the southwest were  
15 dropped because of unmitigatable factors. What  
16 were those factors? The Draft doesn't deal with  
17 that. And does dropping the corridors alter the  
18 -- the proposed action so substantially that  
19 it's almost like a completely new proposal?  
20 Where is this new air traffic going to come in  
21 to justify the expansion? New corridors will  
22 need to be proposed at some future date.

23 Real quickly, Class A mishaps would  
24 be -- would be more likely if there's going to  
25 be a new landing strip installed. Takeoffs and

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 3

The projections for the number of sorties to be flown in the airspace addressed in this EIS are based on a very detailed analysis of training requirements. If the proposal were to be adopted, the ANG would implement management measures to ensure that the parameters of this assessment are not exceeded. Such measures are now in general use.

### Response to Comment No. 4

The factors that led to a decision not to pursue the route corridors involved the location of sensitive resources, including wildlife areas that support migratory waterfowl. These locations, coupled with the Mississippi River flyway, negated any positive training that could be gained from using these routes. New flight corridors in these areas are neither planned nor are anticipated to support DOD training at this time.

### Response to Comment No. 5

As described in Subsection 3.3.3.1 of the EIS, the Class A mishap rates reflected in the document consider the life-time operational use of the aircraft, under all conditions of flight. Therefore, any mishap occurring during any phase of flight is reflected in the statistic. As discussed in the EIS, risks associated with aircraft mishaps is low.

A complete discussion of Class A mishap rates is contained in Subsection 3.3.3.1 of the EIS. Tabulation of statistical projections for Class A mishaps for each aircraft using the airspace associated with this proposal is presented in Subsections 3.3.3.1 and 4.3.3 for current and proposed use conditions, respectively.

## RESPONSES TO COMMENTS

17

1 landings are the most dangerous part, one of the  
2 more dangerous parts of flight. A crash may  
3 occur, so therefore, Class A mishaps would  
4 increase, or be likely to increase.

5 When a F16 from Madison crashes from  
6 Wisconsin in June of '95, it took -- it took  
7 three months before a contract was signed to  
8 remove hazardous materials. Three months after  
9 the crash. Is that what you want in this Wood  
10 County forest is a plane to go down and three  
11 months before arrangement is even made to clean  
12 it up?

13 You know, crop dusting aircraft for  
14 cranberry growers and the Med Flight helicopters  
15 have experienced near misses. Does -- you know,  
16 is this a going to continue to be more of a  
17 problem? You know, when we increase the traffic  
18 and the flights that will occur.

19 What about the water table? What is  
20 it going to cost to build an air strip with the  
21 water table so high. And, you know, can it  
22 really be done effectively? What about  
23 livestock and the effect that they get alarmed,  
24 all be it they do habitat to the noise, but what  
25 about new animals in the area?

6

7

8

### Response to Comment No. 6

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 7

Subsection 3.6.1.2 indicates that in the range expansion area, the elevation of the shallow aquifer often raises above the ground surface level during periods of high precipitation, demonstrating that strong relationships exist between surface water and groundwater. Subsection 2.2.1.1 indicates that potential locations for facility development at the site may be subject to a high water table during various times of the year and that draining or filling of these sites would be required to protect the landing zone. Draining or filling would prevent the engineered soil and rock foundation from becoming saturated and degrading the engineering (strength) properties of the foundation. Draining and filling could increase the cost for engineering and construction of the geotechnical foundation for the landing zone, but these costs would not be prohibitive to the project.

### Response to Comment No. 8

It is possible that aircraft noise could startle domestic animals, especially young or penned animals, and cause them to injure themselves. However, animals adapt and habituate to various sound sources, including jet aircraft noise. Because the airspace associated with the Hardwood Range are existing airspace that have been utilized for many years, this adaptation and habituation to jet aircraft noise has likely already occurred.

1 THE MODERATOR: One minute, sir.

2 AMOS MILLER: Okay. Thank you. What  
3 about the Fish and Wildlife Service and their  
4 letter that that still needs to be settled. Two  
5 and half years have passed since the research  
6 began when shouldn't some outcome be known as  
7 where that stands?

8 What about the Ho-Chunk and their  
9 concerns? Nothing has yet been done to sort of  
10 make some sort of agreement with them, two and  
11 half years since the Draft or since the D.O.P.A.  
12 has come out. That has yet to be settled.

13 What about using other bombing ranges  
14 that some of these particular air units have?  
15 What about Fargo, North Dakota; Duluth;  
16 Louisiana, aren't there closer ranges or  
17 practice areas for these planes instead of  
18 coming all the way up here? What about Fort  
19 McCoy? They do have facilities. Maybe they are  
20 unobtainable sometimes. But how often? When?  
21 The Draft doesn't deal with that.

22 The Draft seems highly inadequate to  
23 us, and we feel that so many more concerns need  
24 to be addressed. You know, federal agencies are  
25 directed to avoid new construction and wetlands

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## RESPONSES TO COMMENTS

### Response to Comment No. 9

Coordination with the USFWS is ongoing through 1998 (USDOJ 1998). The ANG will continue to work with the USFWS to resolve all issues of concern.

### Response to Comment No. 10

The Ho-Chunk and Menominee Tribes have been contacted and issues relevant to Native American concerns have been discussed. The Tribes have indicated that further consultation would be necessary should the ANG acquire the land. The ANG currently has a coordination system in place with the Ho-Chunk Nation that provides for a 5 NM avoidance area during any of their special observances or ceremonies. This system is on an "as called for" basis and is implemented by NOTAM and direct communication with daily users. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

### Response to Comment No. 11

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

### Response to Comment No. 12

The use of the Fort McCoy range facilities as an alternative to the proposed action was discussed in Subsection 2.3.2.1 of the Draft EIS.

### Response to Comment No. 13

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

## RESPONSES TO COMMENTS

19

1 unless there's no practical alternatives. Are  
 2 there no practical alternatives? Do we have to  
 3 go into these wetlands and forest land and take  
 4 more land where there's facilities that are  
 5 already existing for this very important  
 6 training? And nobody is questioning the  
 7 importance of that.

14

8 What about the DNR's conclusions  
 9 already that this -- that this draft and the way  
 10 it's being handled are wholly inadequate? What  
 11 about the wildlife that's going to be taken out  
 12 of this area over the year? You know, what  
 13 about the Ho-Chunk? Get -- you know, this is  
 14 right over their lands, and I just -- I just  
 15 think it's too bad that concerns of private  
 16 citizens and schools and hospitals and people  
 17 aren't a little bit more adequately addressed in  
 18 the Draft. And we hope that in the Final EIS  
 19 some of these things can be dealt with. Thank  
 20 you very much.

15

21 THE MODERATOR: Thank you for your  
 22 comment. Next commenter is Mary Jocham,  
 23 followed by Bill Buckley.  
 24  
 25

### Response to Comment No. 14

The ANG firmly commits to not impact wetlands in development of the proposed expansion area. Wetlands will be avoided as wetlands require extra environmental mitigation efforts, additional engineering requirements, and additional expenditures of limited fiscal resources.

### Response to Comment No. 15

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

# RESPONSES TO COMMENTS

20

1 MARY JOCHAM: I'm really nervous.  
2 Thank you for letting me have the opportunity to  
3 speak. It's here, finally. I don't know how  
4 many of you have gotten this, but it's amazing.  
5 I am -- I have tried to read it. I have to  
6 repeat, tried. I'm not a lawyer. I'm not very  
7 good at trying to figure out what all of this  
8 means, but I know that it's important.

9 But I can tell you this. At  
10 approximately 2:15 p.m. today, a sonic boom  
11 occurred in my area and woke my child, once  
12 again, from her nap. Can someone please explain  
13 to me how an average equated noise level awoke  
14 my child? This so-called average method of  
15 measuring sound is grossly inadequate and does  
16 not take into consideration the true or actual  
17 variances of noise levels.

18 Let me attempt to explain how this  
19 average level of sonic booms impacts our family  
20 and our business. The entire house shakes.  
21 Your heart immediately races to a level of  
22 immediate fear. And you ask, what was that?  
23 Are you okay? You shake. You place your hand  
24 over your heart, and you wait for it to calm  
25 down. But you feel your heart beating faster

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## Response to Comment No. 1

As recognized in Subsection 4.2.1.1 of the EIS, noise is unwanted sound, and it is one of the most common environmental issues associated with aircraft operations. Data on sound levels created by F-16 aircraft at varying distances have been added to the text of the document. None of these sound levels is loud enough to cause physical harm, but some are loud enough to startle or create annoyance. Noise impacts depend not only on the maximum sound level, but also on how long each event lasts and how often the event occurs. Day-Night Average Sound Levels (Ldn and Ldnmr) are used in the noise analysis because they have been found to best reflect the combined effect of these factors. Additional information on the use of cumulative noise metrics is contained in Subsection 3.2 and Appendix F in the EIS.

032HV

Mary

Jocham

## RESPONSES TO COMMENTS

21

1 and faster. On average, at best, it feels like  
2 someone is hitting the house with a wrecking  
3 ball.

4 But these rarely happen I was told by  
5 Captain Olson. They are not supposed to occur.  
6 Well, neither are fatalities and crashes  
7 supposed to occur, but they do. Yet we also  
8 know that these things can happen, both in life  
9 in and nature. And these possibilities are not  
10 adequately addressed in the study.

11 I have traveled over five hundred  
12 miles to attend various EIS report meetings held  
13 in Black River Falls, Wisconsin Rapids, and  
14 Mauston over the last three years. I heard over  
15 and over again by the military that they want to  
16 know how I feel about the expansion. So I told  
17 them.

18 I was shocked to actually receive the  
19 EIS report and see not one mention of my letters  
20 or verbal presentations. In fact, there's not  
21 one opposition statement from anyone in the  
22 report. Why did I travel to attend these  
23 meetings? How naive I was to think that someone  
24 actually cared. So I'm here, again. I have  
25 asked and will continue to ask for the following

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

All comments received during the scoping process associated with this EIS were considered in the preparation of the document. Such comments, as they relate to the proposal, have helped to improve the EIS process and have become a part of the administrative record for the proposal.

The ANG cares about the people that live near their training areas and how they feel about the activity associated with training. The NEPA process is providing the ANG with an opportunity to hear exactly what the public feels about its proposal before any decisions are made. Every scoping comment and every comment on the draft EIS sent to the ANG has been read and incorporated into the administrative record for the proposal. Public comments have provided a better picture of what subjects the public wanted addressed in the document and have enabled the ANG to improve the EIS by focusing attention on specific issues for discussions in the EIS.

## RESPONSES TO COMMENTS

22

1 to be included in the study.

2 The first, my letter dated May 6,  
3 1996, which I have another copy of, a meeting to  
4 be held in all counties affected by this matter,  
5 especially including the County of Adams where I  
6 reside. To date, there has still been zero  
7 mention of either the availability of the EIS  
8 draft statement or a series of public meetings  
9 in our county's only newspaper.

3

10 The third thing is an accurate study  
11 of the true and real impact of these low level  
12 flights, the noises, and especially the sonic  
13 booms have on our educational processes. Has  
14 anyone here asked the children in Wood, Adams,  
15 and Juneau County, how they are affected?

4

16 I have repeatedly asked for this to be  
17 included, and there is no summaries of studies  
18 done. There's only summaries of studies done in  
19 other areas. Well, things that took place in  
20 Germany or Maryland are not necessarily what  
21 represents what's going to be taking place here  
22 in Central Wisconsin. Why not here?

23 My child who is now two, drops  
24 everything, rushes to my side, and clutches my  
25 legs. This is the impact that the noise levels

### Response to Comment No. 3

Announcements of all public meetings were sent to identified media outlets (radio, TV, newspapers) in the areas that may be impacted by this proposal. Some media outlets may not have been on regular ANG contact lists or may have failed to carry the announcement. Based upon newspaper articles and the receipt of comments from all areas of Wisconsin, the ANG believes the public had good knowledge of meeting dates and times and document releases. The ANG is always looking to improve this effort and, if oversight has occurred, it was purely unintentional.

### Response to Comment No. 4

Potential noise effects on humans, animals, and structures are discussed in Appendix F of the EIS.



RESPONSES TO COMMENTS

23

1 have on her. So how much valuable teaching time  
2 is delayed, stymied, and interrupted by these  
3 flights and the sonic booms? Which, yes, I'm  
4 sorry to say, they do occur.

5 In addition, I'd like to speak briefly  
6 about in terms of economics. The EIS report has  
7 a statement which says, revenue from recreation  
8 and tourism may also increase since public  
9 access for recreation would be required. I  
10 believe the Central Wisconsin counties are  
11 actually losing potential buyers. Who wants to  
12 purchase land when its skies are not quiet, its  
13 air offensive, or the waters are not clean?

14 THE MODERATOR: One minute, ma'am.

15 MARY JOCHAM: Perhaps the military  
16 figures that the sleeping habits of a two year  
17 old is insignificant to their expansion. A  
18 military who figures that what they have is not  
19 enough. A military who cannot control their own  
20 pilots from refraining from the creation of  
21 sonic booms. Our military --

22 Let's just not risk the impact of any  
23 expansion that would save -- that would have on  
24 the lives of our families. I say no to any  
25 expansion or any increase in flights. Thank

-5

**Response to Comment No. 5**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 you.

2 THE MODERATOR: Please, again, I ask  
3 you to hold on your applause. I've been asked  
4 by the court reporter that if you have written  
5 comments, it would help a great deal if you  
6 could submit that to the court reporter. That  
7 way we can ensure that we have a complete,  
8 accurate statement to include everything that  
9 you have stated. Our next speaker is Bill  
10 Buckley, followed by Mary Brown.

11

12

13 BILL BUCKLEY: Good evening, I'm Bill  
14 Buckley from Marshfield, I'm president of the  
15 Wisconsin Wildlife Federation, statewide  
16 conservation clubs representing over one hundred  
17 clubs in the state wildlife organizations. I  
18 also represent Wisconsin Conservation Congress  
19 which is a constitutionally legislatively  
20 directed body that advises the DNR. On the  
21 Congress, I am one of twenty-four counselors  
22 that control the Congress. And I also chair the  
23 Congress's Environmental Practices Committee.  
24 Those are my basic bonified reasons for my being  
25 here today.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

RESPONSES TO COMMENTS

25

1           This process began for us in February  
2       '95, almost four years ago, almost three years  
3       ago. I testified that night at Pittsville.  
4       Later on, I testified at the Wisconsin Rapids  
5       courthouse. Later on, I testified at the Black  
6       River Falls Armory. Later on, I testified in  
7       the meeting at Volk Field. And now we're back  
8       full circle, a fifth time I'm testifying on  
9       behalf of the people I represent against this  
10      bombing range.

11           I'm not an expert on military flights  
12      or MOA's or any other -- I'm mostly a retired  
13      teacher. The major concern of the two  
14      organizations I represent is the loss forever of  
15      seven thousand acres of forest. That's a big  
16      number. And it's hard to translate and hard to  
17      envision. But if you break it down, that's a  
18      piece of land that is eleven square miles of our  
19      county forest to be given up almost, it seems,  
20      as a whim.

21           There's nothing I run across that's  
22      been more imperious than the process that we've  
23      gone through. As I said, I have testified four  
24      times already on this issue. And every time, we  
25      were promised, like we're here tonight, that

GROSSBIER & ASSOCIATES, INC. 800-706-0691

**Response to Comment No. 1**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

0331HV

BBI

Buckley

## RESPONSES TO COMMENTS

26

1 your testimony, boy, will be included, in our  
2 statements. I guess they can't spell Buckley,  
3 B-U-C-K-L-E-Y, William J. We'll try again.

2

4 How do you replace seven thousand  
5 square acres of county forest. Doesn't take a  
6 genius to figure out you can't do that. I spoke  
7 before about having to buy up sixty-two hundred  
8 acres of little bitty parcels throughout Wood  
9 County. But do not come put together the kind  
10 of forest we have now.

3

11 To give you some idea what they have  
12 right now, their present range in acreage is  
13 about the same size of the City of Marshfield.  
14 I'd feel pretty safe up there because if they  
15 can't hit anything at their present range, they  
16 couldn't hit anything in Marshfield either.  
17 I've tried to keep this in perspective, but I  
18 have seen nothing in the Draft EIS, except  
19 gloss-overs stating that we looked at all the  
20 other alternatives.

21 But did you see any citations in the  
22 book? Did you see any citations of the ranges  
23 that they're closing under the base closing  
24 rules that are already contaminated? I didn't  
25 see any. Did you see any consideration in there

4

### Response to Comment No. 2

All comments received during the scoping process associated with this EIS were considered in the preparation of the document. Such comments, as they relate to the proposal, have helped to improve the EIS process and have become a part of the administrative record for the proposal.

### Response to Comment No. 3

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

### Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 about noise levels? I saw a word "acceptable."  
 2 Did you see anything in there about decibels  
 3 that would verify the term "acceptable?" I must  
 4 be one of the special ed kids.

5

5 THE MODERATOR: One minute.

6 BILL BUCKLEY: I have some other  
 7 specific comments on the Draft Statement. F16's  
 8 we were told that, boy, this is a safe  
 9 aircraft. We lost three of them last week.  
 10 Must be trying to clear their inventory so they  
 11 can get the F22 on line. I don't recall, this  
 12 is the same aircraft? Maybe I'm nuts.

13 We're going to use, quote, "advanced  
 14 long range air-surface weapons." Whatever the  
 15 hell that is. We were promised by Volk Field  
 16 they're going to use nothing but concrete bombs  
 17 and bomblets and cannon. I don't know how that  
 18 equates with the quoted advanced long range  
 19 air-surface weapons.

6

20 THE MODERATOR: I'd ask you to bring  
 21 your comments to a close.

22 BILL BUCKLEY: Sir?

23 THE MODERATOR: Bring your comments to  
 24 a close.

25 BILL BUCKLEY: Aye-aye, sir. Landing

## RESPONSES TO COMMENTS

### Response to Comment No. 5

As recognized in Subsection 4.2.1.1 of the EIS, noise is unwanted sound, and it is one of the most common environmental issues associated with aircraft operations. Data on sound levels created by F-16 aircraft at varying distances have been added to the text of the document. None of these sound levels is loud enough to cause physical harm, but some are loud enough to startle or create annoyance. Noise impacts depend not only on the maximum sound level, but also on how long each event lasts and how often the event occurs. Day-Night Average Sound Levels (Ldn and Ldnmr) are used in the noise analysis because they have been found to best reflect the combined effect of these factors. Additional information on the use of cumulative noise metrics is contained in Subsection 3.2 and Appendix F in the EIS.

### Response to Comment No. 6

As noted in Subsection 3.3.4.1 of the EIS, only training or inert ordnance is used on the range. No "live" (high explosive) bombs or high explosive/incendiary gun ammunition is permitted.

RESPONSES TO COMMENTS

28

1 strip. They're going to build a landing strip  
2 for hundreds of thousands of dollars, and it's  
3 two minutes, two minutes flight plan from Volk  
4 Field. Now the guys who are bringing this  
5 project to Wisconsin are the same US Air Force  
6 that paid \$600.00 apiece for ballpeen hammers.  
7 Paid \$2,000.00 apiece for toilet seats.

8 Are these the guys that you trust to  
9 bring this in on an economical basis or that  
10 they even claim that they want this because of  
11 economy reasons? I've never seen these guys  
12 practice economy. I would love to have a  
13 concession selling the Air Force \$600.00  
14 ballpeen hammers. Believe me, I wouldn't be  
15 here now. I'd be in London with a Rolls Royce  
16 like the rest of the folks.

17 THE MODERATOR: Sir, your time is up.  
18 Thank you. For the third time, I ask that you  
19 hold your applause. I asked for no  
20 interruptions, and it has to be that way. The  
21 next speaker is Mary Brown, followed by Jwanta  
22 Martinson.

23

24

25 MARY BROWN: Thank you, Mr. Simonson,

GROSSBIER & ASSOCIATES, INC. 800-706-0691

Response to Comment No. 7

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

29

1 for this opportunity. My name is Mary Brazeau  
2 Brown and I'm a resident of Wood County and in  
3 the Town of Cranmoor. The Hardwood  
4 Air-to-Surface Gunnery Range near Finley,  
5 Wisconsin is located in the northern part of Old  
6 Glacial Lake, Wisconsin, an area of original  
7 wetlands diverse in wildlife habitat, and  
8 maintained as the largest area of inland grown  
9 cranberries in the world.

10 Since the Clean Water Act and a No Net  
11 Loss of Wetlands Campaign, much attention has  
12 been drawn to this area because of its richness  
13 in wildlife diversity, and a need to protect  
14 this diversity. I find it ironic that the EIS  
15 admits impact to surface waters and wetland  
16 resources, and that they exist.

17 Just north of the current range, my  
18 family are owners and stewards of a six thousand  
19 acre cranberry operation comprised of wetlands,  
20 woodlands, and three hundred acres of cranberry  
21 beds. That's home to Sandhill Cranes, Blandings  
22 Turtles, Loons, and Trailing Arbutus to name a  
23 few indicator species.

24 Once again, I find it rather ironic  
25 that doubling the Hardwood Range acreage into

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

034HV

Mary

Brown

## RESPONSES TO COMMENTS

30

1 these kinds of wildlife areas is even an  
2 option. The existing training route already  
3 detracts from the area's quality of life. I  
4 have witnessed geese, hawks, and ducks take off  
5 from their roosts; children jump out of their  
6 sand boxes; and dogs bark until they are hoarse  
7 as sorties pass over. Already this is an  
8 interference and an intrusion on the -- all of  
9 the life of this area.

10 This whole issue is a classic example  
11 of government versus people, and reflects  
12 inconsistencies with state policy, and  
13 directions specifically regarding DNR  
14 administrative rules. For example, the County  
15 Forest Law, wetland protection, and wildlife  
16 management. In the case of County Forest Law,  
17 if we don't comply with the original intent of  
18 the statutes and consistent application of  
19 resulting administrative rules, our laws are  
20 worthless.

21 When it comes to national defense, why  
22 can't the branches of our government and  
23 military cooperate their efforts and consolidate  
24 their facilities? How many military bases have  
25 been closed recently? This cooperation of

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



## RESPONSES TO COMMENTS

31

1 effort and consolidation of facilities would be  
2 a good example to other branches of government,  
3 businesses, and individuals of this country  
4 showing prudent fiscal responsibility and  
5 environmental stewardship.

6 I believe in efficient national  
7 defense. I oppose the expansion of the Hardwood  
8 Range. } 3

9 THE MODERATOR: Thank you for your  
10 comment.

11 MARY BROWN: One other thing I do have  
12 is a copy of the Town of Cranmoor's board  
13 resolution that I would submit as written  
14 testimony opposing the expansion of the range. } 4

15 THE MODERATOR: If you can please  
16 turn that over to the court reporter, thank  
17 you. Next commenter is Jwanta Martinson.

18  
19

20 JWANTA MARTINSON: My name is Jwanta  
21 Martinson. And do you want my address? 445  
22 Kimball Avenue, Nekoosa. I have heard a lot of  
23 comments here tonight which I agree with, but I  
24 want to give my view of what I think is going  
25 on. I want to express my belief that I think

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 that the proposed expansion of the Air National  
 2 Guard for a bombing range that would take 6,125  
 3 acres of county forest crop and 975 acres of  
 4 privately owned property is a violation of our  
 5 civil rights.

6 Under Constitutional Law, the American  
 7 Jurisprudence Second Edition, defines civil  
 8 rights as follows: Paragraph 2, as such right  
 9 as the law will enforce and if all of those  
 10 rights which the law gives a person, for  
 11 example, the right to vote, is a civil right of  
 12 the highest order. Also the rights to acquire,  
 13 enjoy, own, and dispose of property is also a  
 14 civil right.

15 The people of Wood County own the  
 16 county forest and have spoken through their  
 17 county board that they have no desire to dispose  
 18 of their county forest. Therefore, as owners of  
 19 county forest, they are being denied their civil  
 20 rights under the Constitution as defined by the  
 21 American Jurisprudence.

22 On July 11, 1995 on C Span general --  
 23 I can't pronounce his name but you know who he  
 24 is. S-H-A-L-I-K-A-S-H-V-I-L-E, chief of staff,  
 25 was giving testimony before the House National

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

33

1 Security Committee, and he was asked by  
2 representative Duke Cunningham a republican from  
3 California if it was a fact that twenty percent  
4 of F16's are lost in combat and training. And  
5 the general said, yes. And I got articles  
6 attached about mishaps.

7 Retired Colonel David Hackworth on CNN  
8 on September 3, 1996 said pilot flown planes are  
9 on the way out, but the generals do not want to  
10 admit it. The missile is the weapon of future  
11 warfare. He has just written a book called,  
12 "Hazardous Duty" which is full of a lot of  
13 information which I won't go into.

14 And then I was thinking, the  
15 Environmental Impact Statement, in my view, is  
16 incomplete because it fails to address the  
17 Eminent Domain issue. The very real possibility  
18 of the county forest being seized by Eminent  
19 Domain and the effects of that action should  
20 have been included in the EIS.

21 And I want to thank our county board  
22 for its wisdom and its courage to say no to this  
23 plan. Thank you.

24 THE MODERATOR: Thank you for your  
25 comments. Next commenter will be Ellen Allan,

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

## RESPONSES TO COMMENTS

1 followed by Troy Brey.

2

3

4 ELLEN ALLAN: I am Helen Allan, Mrs.  
5 Ralph Allan. I have lived in the town of  
6 Armenia, North Juneau County for the past  
7 sixteen years on land the Allan family bought  
8 back in 1961, land from which we learned much,  
9 land we have greatly enjoyed, and land we still  
10 treasure. Over the years, the family has seen  
11 many changes take place in the area, which as  
12 environmentalists and outdoor enthusiasts, have  
13 in some cases caused us concern.

14 There is now reason for new concern  
15 with the proposed expansion of the Hardwood  
16 Bombing Range, an expansion that could have  
17 wide-ranging impact on public forest lands in  
18 both Juneau and Wood Counties. And the  
19 expansion could also have wide ranging impacts  
20 on the people in both counties. We're hearing  
21 that tonight as many have been testifying.

22 In going through this some thousand  
23 pages of the Draft Environmental Impact  
24 statement as carefully as I could in the  
25 allotted time before these public hearings, I

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## RESPONSES TO COMMENTS

Response to Comment No. 1

Section 28.11(1) of the Wisconsin Statutes does not specifically state that military use of county forestlands is authorized or prohibited. In the past, the Wisconsin Attorney General's Office has stated that lack of specific statements giving authorization is a shortfall. One Attorney General stated this could be remedied by "either legislative amendments or the expansion of existing military establishments." Clearly, the pursuit of the expansion is what is now being addressed. However, this prohibition against use does not stop the withdrawal of the lands from the County Forest Law Program and sale of the lands for range expansion. That decision will be based on the results of the environmental studies. If a decision is made to expand the range, the county and the Wisconsin's Department of Natural Resources will be involved in the withdrawal process.

1 failed to find any mention of a major underlying  
2 issue, the loss of two military operations of  
3 public forest both in Juneau and Wood Counties.

4 In the course of Juneau County, a  
5 fifty year old easement has been used down  
6 through the years to justify the use of public  
7 forest lands for military purposes, for bombing  
8 operations to be specific. But for the -- but  
9 for that outdated easement, Juneau County would  
10 not be living up to the county forest love which  
11 puts a responsibility on the counties as stated  
12 in Section 28.11 of the Wisconsin State  
13 Constitution to manage and protect the natural  
14 resources of the county forest lands. No  
15 options stated to bomb them.

16 In the case of the Wood County public  
17 forest land, there is no handy fifty year old  
18 easement to use in justification for bombing  
19 operations on Wood County forest lands. So in  
20 the event of the Hardwood Bombing Range going  
21 through, Wood County supervisors and this is in  
22 the face of -- well, would have some difficult  
23 decisions to make and some fancy maneuverings to  
24 negotiate to get around the County Forest Laws  
25 stated in Section 28.11 in the Wisconsin State.

## RESPONSES TO COMMENTS

36

1 That would be -- that would only happen if the  
2 supervisors were prevailed upon to change their  
3 present opposition, and that is something that  
4 we've seen it happen in other instances.

5 In any case, all the maneuvering now  
6 would have to take place in full public glare,  
7 in the face of strong opposition from outdoor  
8 enthusiasts and protectionists who view public  
9 forest lands in Wisconsin as valuable resources  
10 to be protected for the future outdoor  
11 enthusiasts such as hunters, trappers, fishermen  
12 hikers, skiers to name a few. And then there  
13 would be the protectors, protectors of wildlife  
14 habitats and the wild creatures therein,  
15 protectors of fish stocks, and endangered  
16 plants.

17 And another major category, the  
18 protectors of water quality, air quality, soil  
19 quality. In sum total, a growing and diverse  
20 opposition to the Hardwood Range Expansion and  
21 Assorted Airspace Actions. In the interest of  
22 giving others who wish to speak tonight time,  
23 I've confined my remarks to the public forest  
24 lands issue.

25 But right here and now, I would like

GROSSBLIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

-2

036814

Ellen

Allan

## RESPONSES TO COMMENTS

37

1 to salute those who have come to speak on the  
2 their convictions. I also would like to salute  
3 the audience that has come to hear that  
4 testimony. The public needs to be informed  
5 about what might well be a landmark step in  
6 coming to grips with what the future holds for  
7 all of the us in this Central Wisconsin area.

8 THE MODERATOR: One minute.

9 ELLEN ALLAN: Thank you. Thank you  
10 very much.

11 THE MODERATOR: Troy Brey.

12

13

14 TROY BREY: I'm speaking on behalf of  
15 area tax payers and sportsmen. First of all, we  
16 would like to say we're not opposed to military  
17 training, but have limited tolerance when the  
18 Air National Guard has 7,929 acres of land in  
19 Juneau County and wants another 7,137 acres in  
20 Wood County.

21 There are over 73,000 people that live  
22 in Wood County that need not tolerate a bombing  
23 range expansion. The Air Force requirement for  
24 a bombing range to get proper tactical training  
25 is at least seven miles by five miles for target

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 1

The term "requirements" means training can not be accomplished unless the item or situation is available. The text has been revised for clarification. Experience has established a goal that ranges should be 7 miles by 5 miles in size to conduct optimum training. However, many types of training can be accomplished in smaller areas, though not as effectively as with a larger area.

037-14

Troy

Brey

## RESPONSES TO COMMENTS

38

1 dispersal. This would mean at least 22,400  
2 acres is needed to meet Air Force requirements.  
3 Even with the land the Air National Guard wants  
4 in Wood County, the total would only be 15,066  
5 acres. The Air National Guard would actually  
6 need another 7,334 acres to meet Air Force  
7 safety regulations.

8 There doesn't appear to be a whole lot  
9 of support in the impacted area for bombing  
10 range expansion, and we wonder how this proposal  
11 can be justified. We also question the  
12 shenanigans of the bombing and withdrawal of  
13 Juneau County forest crop lands. We feel the  
14 medical helicopter should not have to sacrifice  
15 precious time to get a military clearance for  
16 flying if an emergency arises.

17 We want to know why training is needed  
18 for more strafing with the technology the  
19 military has with cruise missiles and smart  
20 bombs. Area sportsmen feel the land the Air  
21 National Guard want is too valuable a natural  
22 resource to surrender, and urges local and state  
23 officials to do what is necessary to block the  
24 expansion proposal.

25 We are disappointed the Air National

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 3

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

### Response to Comment No. 4

Modern military aircraft, such as the F-16, have an internally mounted gun as part of its weapons arsenal. The gun is a highly potent weapon when used in conjunction with other weapons or tactics.

### Response to Comment No. 5

At all meetings, the public had the opportunity to both comment orally or in writing or had the opportunity for one-on-one discussions with ANG representatives knowledgeable on this action and the documents presented.



1 Guard didn't use a question-answer format  
 2 because we wanted to hear answers from other  
 3 people's concerns live tonight. The Air  
 4 National Guard has plenty of other places to do  
 5 some of their training, and we feel that an  
 6 expansion to Wood County will ruin the quality  
 7 of life that we now have. Thank you for your  
 8 time, ladies and gentlemen.

6

9 THE MODERATOR: Thank you for your  
 10 comment. Ladies and gentlemen, we're going to  
 11 take a ten minute break. The reporter needs to  
 12 have a quick break here. Thank you.

13 (Whereupon a discussion was  
 14 held off the record.)  
 15  
 16

17 THE MODERATOR: Ladies and gentlemen  
 18 I'd like to call the meeting back to order. I  
 19 really appreciate your patients. You're very  
 20 good tonight. We'll now continue the formal  
 21 comment period. The next commenter will be Tom  
 22 Lochner, followed by Dan Joling.  
 23  
 24

25 TOM LOCHNER: My name is Tom Lochner.

## RESPONSES TO COMMENTS

Response to Comment No. 6

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

1 I'm the executive director of the Wisconsin  
2 State Cranberry Growers' Association. We're  
3 located here in Wisconsin Rapids. We're at  
4 P. O. Box 365, Wisconsin Rapids, 54495. We  
5 appreciate the opportunity to be here tonight to  
6 offer our comment on the Draft EIS.

7 I obtained my copy of the EIS  
8 yesterday, so I haven't had a chance to wade  
9 through it, but we have been following this  
10 issue. Our board of directors asked our  
11 Governmental Relations Committee to develop a  
12 position on the proposed expansion of the  
13 Hardwood Range, and our comments are relative to  
14 just the expansion of the range and that portion  
15 of the EIS.

16 The Growers' Association here in  
17 Wisconsin represents about eighty-five percent  
18 of planted acreage of cranberries in the state.  
19 Wisconsin is the largest producing cranberry  
20 state in the country, and this area of the state  
21 obviously is the largest producing area of  
22 that. It's the state's largest group crop as  
23 well. So we have a vested interest in what  
24 happens in Central Wisconsin with our resources,  
25 and primarily Wood County.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## RESPONSES TO COMMENTS

1           The effects of the expansion of the  
2   Hardwood Range on growers here would be  
3   substantial. Wood County, as I said, is the  
4   largest producing county in the largest  
5   producing state of cranberries. And we would  
6   estimate over two-thirds of the cranberry  
7   production acreage is in or near the proposed  
8   range.

1

9           Our issues and concerns that we have  
10   with the proposed expansion fall in a number of  
11   categories, and until these issues are  
12   addressed, our association remains opposed to  
13   the expansion of that range. First one is the  
14   impact of the proposed expansion on the  
15   day-to-day operations of our growers. Our  
16   growers are involved in normal agricultural  
17   practices, and we question whether we will be  
18   able to continue to operate our farms in the  
19   most efficient manner available.

2

20           We have concerns about aerial  
21   applications of chemicals. And we also are  
22   concerned that the denial of the availability of  
23   these types of technologies to growers may  
24   dampen the willingness of our current growers to  
25   expand or reinvest in their operations here in

3

**Response to Comment No. 1**

Cranberry farming in Wood County and in the range expansion area is discussed in the Socioeconomic Subsections 3.12 and 4.12 and in Appendix I.

**Response to Comment No. 2**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

**Response to Comment No. 3**

The ANG recommends that interested parties call Volk Field at (608) 427-1201 to resolve current operations problems involving Alexander Field Airport and military aircraft. Aircraft on a VFR flight plan are authorized to transit military operations areas (MOAs) at all times at the pilot's discretion. To help determine if a MOA is scheduled to be used during the desired transit time, pilots can call (800) 972-8673 or listen to an ANG-sponsored airspace information system recording broadcast on frequency 120.0 MHz. The ANG initiated this recording as a service to pilots so they can plan their flights knowing the military's planned activities. The aircraft have unimpeded access to MOAs during periods of non use.

## RESPONSES TO COMMENTS

42

1 Central Wisconsin. We think that has an  
2 economic impact on Wood County as well.

3 We're very concerned about water  
4 impacts both in terms of water quality, and in  
5 terms of water quantity and availability for  
6 growers. Water is the key component in  
7 cranberry production. The reason cranberries  
8 are grown in Central Wisconsin and are  
9 successfully cultivated here is our ability to  
10 access good, clean, high quality water.

11 And we're not certain that the Draft  
12 Environmental Impact Statement adequately  
13 addresses those issues as to what is going to be  
14 the impact on water availability for the  
15 operations there in Central Wisconsin.

16 We're also concerned about the direct  
17 impact that the proposed expansion would have on  
18 at least one of our growers who is in the  
19 proposed acquisition area. It's a family  
20 operation that was started there. The family  
21 has been in the business for a long time, and  
22 they've invested substantial amounts of money in  
23 their operation there in the hopes of realizing  
24 their dream of growing, continuing in the family  
25 tradition of growing cranberries. And we're

### Response to Comment No. 4

Subsection 4.6.2 discusses potential impacts that could occur to both surface and groundwater resources. Construction activities and use of the target complex, landing zone, and drop zone, if constructed, could impact drainage patterns within the range expansion area because small diversions or drainages may need to be developed to route drainage around facilities. Localized changes in drainage patterns or routing drainage would not use water and would not affect water quantity in the region. Subsection 4.5.2.3 indicates that use of the tactical target complex and construction activities could increase soil erosion in localized areas, potentially causing impacts to water quality. These impacts would be mitigated and managed through the use of Best Management Practices (BMPs) to stabilize and minimize soil movement at the areas of disturbance. Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsection 3.3.3.1 (Aircraft Mishaps), Subsection 3.3.4.1 (Munitions Use and Handling), and Subsection 3.4.1 (Hazardous Materials and Solid Waste). Based on this information adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. Subsections 4.5.2.3 (Water Quality) were modified to reference the appropriate subsections in Section 3, and discuss conclusions regarding water quality.

### Response to Comment No. 5

See response to Comment No. 1.

1 concerned about their ability to do that.  
 2 We're also concerned about the  
 3 unresolved issues surrounding the takings of --  
 4 not only direct takings of private property, but  
 5 also the takings of some of the rights that  
 6 people have in Central Wisconsin and our growers  
 7 have out there as far as quality of life, noise  
 8 impacts, and the inconveniences in the  
 9 day-to-day activities that the proposed  
 10 expansion is going to have on the people that  
 11 live out there.

12 We're concerned and those issues have  
 13 not been resolved by the Environmental Impact  
 14 Statement as we read it. We're also concerned  
 15 about the detrimental effects of noise  
 16 pollution, its location, and its frequency on  
 17 our growers and their families and their  
 18 employees in Central Wisconsin.

19 We are very concerned about the  
 20 withdrawal of forest crop land and its impacts  
 21 on tax payers in Wood County along with the  
 22 environmental impacts. For me, it's hard to  
 23 imagine that there isn't an impact with the  
 24 withdrawal of seven thousand acres of forest  
 25 land which is multi-use and recreational, and

6

7

8

## RESPONSES TO COMMENTS

**Response to Comment No. 6**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

**Response to Comment No. 7**

As recognized in Subsection 4.2.1.1 of the EIS, noise is unwanted sound, and it is one of the most common environmental issues associated with aircraft operations. Data on sound levels created by F-16 aircraft at varying distances have been added to the text of the document. None of these sound levels is loud enough to cause physical harm, but some are loud enough to startle or create annoyance. Noise impacts depend not only on the maximum sound level, but also on how long each event lasts and how often the event occurs. Day-Night Average Sound Levels (Ldn and Ldnmr) are used in the noise analysis because they have been found to best reflect the combined effect of these factors. Additional information on the use of cumulative noise metrics is contained in Subsection 3.2 and Appendix F in the EIS.

**Response to Comment No. 8**

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

## RESPONSES TO COMMENTS

44

1 converting that to a bombing range.

2 And we think there are impacts, there  
3 are obviously environmental impacts. We think  
4 they are significant, and we think they are  
5 significant enough that we can't believe that  
6 the Environmental Impact Statement would dismiss  
7 them or gloss-over them. And we think there  
8 needs to be a closer look taken at that.

9 We're also concerned about what the  
10 impacts of withdrawing forest land by the county  
11 and looking for land to acquire elsewhere in the  
12 county, the impact that's going to have on tax  
13 payers. I think Mr. Rosandick talked a little  
14 bit about some of the opposition that was faced  
15 by the county when they talked about going out  
16 into other townships looking for -- for sites  
17 and looking for land to acquire, and taking that  
18 land out of the tax rolls is going to have an  
19 impact on all of Wood County tax payers.

20 We're concerned also about the loss of  
21 recreational opportunities in Central Wisconsin  
22 and the pressure that that loss of opportunity  
23 is going to have on private lands in the  
24 increased incidents of trespass that may occur  
25 or in the increased pressure on land owners to

GROSSBIER & ASSOCIATES, INC. 800-706-0691

9

### Response to Comment No. 9

See response to Comment No. 8.

RESPONSES TO COMMENTS

45

1 open their property up to public hunting and  
2 public access at times when they may not want to  
3 do that.

4 THE MODERATOR: One minute, sir.

5 TOM LOCHNER: Thank you. In closing,  
6 we'd like to thank the Air National Guard for  
7 the opportunity to testify. We appreciate the  
8 efforts of their staff people here in Wisconsin  
9 and their willingness to meet with our growers  
10 on a number of opportunities to try and answer  
11 our questions.

12 We think they've been very  
13 professional. We certainly appreciate that. We  
14 just believe that we have a bit of a difference  
15 with them about the impacts of this proposal.  
16 We'll be submitting written comments later, but  
17 we'd liked to continue to talk with them about  
18 those impacts. And, again, thank you for the  
19 opportunity to be here tonight.

20 THE MODERATOR: Thank you for your  
21 comment. Next will be Daniel Joling, followed  
22 by Harold Gaier.

23

24

25 DANIEL JOLING: My name is Daniel

GROSSBIER & ASSOCIATES, INC. 800-706-0691

-10

Response to Comment No. 10

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

038HV

Tom

Lochner

1 Joling. I live at 332 Hampton Circle, Nekoosa.  
2 I'm here as a resident of the City of Nekoosa  
3 and Wood County, as a family man, and father, as  
4 an Army reservist, and a trainer of combat  
5 support and combat service support elements on  
6 the ground. I'm not an alarmist, and I don't  
7 mean to talk from that, but there's some things  
8 that I would ask you to just consider.

9 World War II we had a build up after  
10 Pearl Harbor. Our lines of communication,  
11 responsiveness of the world and its military  
12 forces were much longer and much slower. It's  
13 not that way any more. Career, we had task  
14 force men. At that time after the draw down of  
15 forces after World War II, we put together hodge  
16 podge units of personnel and equipment, told  
17 them because they march into Korea and say US  
18 Army tapes on there, no problem. North Koreans  
19 might not have been an issue, but the Chinese  
20 were. We had a lot of people killed.

21 And in Vietnam, we drew down from  
22 Korea and then we built back up, escalated into  
23 Vietnam. We did it again. We had a lot of  
24 people killed. We went in with hodge podge  
25 equipment, our technology, we weren't trained



# RESPONSES TO COMMENTS

47

1 on. We had one family of radios trying to talk  
2 to another family of radios. People died.  
3 Unfortunately, like I say, it's a deadly  
4 business we're in and my fellow, air people,  
5 what we do is not fun. Nobody really wants to  
6 talk about us until you're needed.

7 As the videotape said earlier, we're  
8 drawing down. We've gone from 750,000 standing  
9 Army down to 250,000. People like me stand a  
10 much better chance of being activated. I'm a  
11 ground force, by trade I'm an arterial man. My  
12 job is on the ground to engage targets for the  
13 infantry. But at that same time, I have to call  
14 for close air support. I hope like hell they  
15 know what they're doing.

16 It's in the history books and we'll  
17 be -- be able to -- one of the biggest killers  
18 in Desert Storm, which was by far a successful  
19 military operation, was fratricide, which means  
20 we killed our own. And that happens. It's  
21 happened in every war, and probably happen  
22 again. But through training, we hope to  
23 eliminate that as trainers and people in the  
24 profession of arms.

25 And soldiers, we talked about F16's.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

039HIV

Daniel

Jelting

1 Yes, they do go down. If you watch the news,  
2 the 111 disintegrated in the air. Why? We  
3 don't know yet. We're going to find out. We're  
4 going to -- real hard. You know, we're as  
5 concerned on the ground as our brothers in blue  
6 and sisters. But we've had a lot of soldiers  
7 killed in ground war, tactical vehicles, tanks,  
8 hummers, heps, deuce and a halves, all the  
9 ground vehicles that have crashed and burned  
10 because sometimes equipment failure. A lot of  
11 times we find soldier failure, things they  
12 aren't trained to do.

13 And that's I guess the big thing.  
14 We're in a changing world. We no longer have a  
15 Soviet Union to concern with. But who's our  
16 enemy going to be? We don't know. We have to  
17 be ready. No longer are we looking at world of  
18 power, deployed, forward deployed. We're  
19 looking at power projection, how fast can we get  
20 troops from Central Wisconsin, Fort McCoy which  
21 is a power projection platform to Bosnia, to  
22 Croatia, to Korea, to Japan, to wherever we got  
23 to put them. It could happen overnight.

24 THE MODERATOR: One minute, sir.

25 DANIEL JOLING: Okay. Thank you,

## RESPONSES TO COMMENTS

49

1 sir. Economic impact. There is Fort McCoy, but  
2 Fort McCoy trains ground troops. So we have  
3 close air support, but Volk Airfield is a  
4 deployment platform for the Air Force which  
5 houses and allows them an air strip. There's a  
6 need and this Hardwood is a part of that  
7 organization.

8 And we're fortunate to have that in  
9 Wisconsin. We really are. You don't realize it  
10 here, but it is an important part. And I would  
11 ask you to just take that time, think about that  
12 a little bit, and thank you for your time.

13 THE MODERATOR: Thank you for your  
14 comment. Harold Gaier, followed by Walter  
15 Embke.

16  
17  
18 HAROLD GAIER: Thank you. My name is  
19 Harold Gaier. In the aviation circles you  
20 probably recognize the name Duffy. I want to  
21 wear three hats tonight. First thing I want to  
22 talk about is as a citizen and a resident of  
23 Clark County. I am -- second hat is I'm the  
24 manager of the Neillsville Airport which is  
25 located in the Falls Two MOA, and I'm also the

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

50

1 manager of the Marshfield Airport.  
2 No. 1 as a citizen. We own some  
3 recreational property at Hatfield, something  
4 I've owned for thirty-six years. I built a  
5 cabin thirty-six years ago. And the  
6 recreational area in Hatfield, surprises me that  
7 it's not included in the -- in the statement  
8 that we have here. I'd sure like to see that  
9 included in there. It represents thousands of  
10 people in the summertime.

11 We have the large Clark County Russell  
12 Memorial Park, camping, water sports,  
13 recreational trails, and so on. We have the  
14 large Jackson County park area, which -- with a  
15 lot of campsites, water sports, and recreational  
16 trails. We have the state park there with the  
17 horse trails and park that they have there.

18 I can appreciate that a large lake  
19 certainly makes a good visual reference for an  
20 aircraft flying overhead. I have personally  
21 witnessed children playing in the water and  
22 running out of the water screaming because of  
23 low level flying airplanes on more than one  
24 occasion. I think this is pretty tragic.

25 One Saturday afternoon I was mowing

### Response to Comment No. 1

Hatfield is located under the Volk West MOA. Volk West MOA is not anticipated to have additional flights above its previous assessment. Therefore, it is not included in the study.

## RESPONSES TO COMMENTS

51

1 lawn, I have a Lawnboy push mower. I think you  
2 realize they're a little bit on the noisy side.  
3 I thought that it was in the process of  
4 self-destructing. I reached down to shut the  
5 mower off, and then realized it was another F16  
6 going over the top.

7 My second hat regards the Neillsville  
8 Airport. It's located in the Falls Two MOA.  
9 I'm a FAA designated pilot examiner. And as a  
10 result of that, I do pilot exams. The MOA  
11 excludes three miles around the airport and  
12 fifteen hundred feet high. I don't know how  
13 many pilots are in this room, but it's pretty  
14 difficult to conduct a flight test in that size  
15 of area. Safely, that is.

16 The statement in the Guard  
17 presentation states, airspace available almost  
18 all of the time. I would certainly challenge  
19 that statement, and I'm sure that any 135  
20 operator operating out of Neillsville or  
21 Marshfield or any general aviation IFR pilot  
22 that wants to file an IFR flight plan, for  
23 example, from Neillsville to La Crosse, they'll  
24 accommodate you, certainly. And they may say  
25 ready to copy, clear to Eau Claire, clear direct

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

Military pilots are held accountable for complying with FAA Order 7610.4 to avoid charted, uncontrolled airports by 3 NM laterally or 1,500 feet vertically to ensure flight safety for operations such as flight tests. That same directive states that aircraft can transit airspace designated as a military operations area (MOA). The military works with general aviation associations and air traffic control agencies to help ensure that all aircraft can have unimpeded access to MOAs during periods of non use. Aircraft on a VFR flight plan can transit a MOA at their discretion at any time. This proposal will not change the lateral boundaries of existing MOAs. Therefore, nothing in this proposal will adversely affect instrument approaches to the Marshfield Airport.

010/IV

Harold

Galer

1 no dine, clear to La Crosse. That's just an  
2 example.

3           Regarding the Marshfield Airport, we  
4 have extensive air taxi operations off of the  
5 Marshfield Airport. It means a lot to the  
6 economy of our community. We're not serviced by  
7 four-lane highway in Marshfield. It's real  
8 important for us, our air transportation and  
9 other, and certainly there's a lot of delays, a  
10 lot of rerouting, and a lot of costs involved  
11 with avoiding the MOA's because Minneapolis  
12 Center just simply can say it's not available.  
13 That means we got to go around them.

14           We're very much concerned about the  
15 proposed flight path of the expanded MOA. They  
16 talk about a south to north route across the  
17 MOA, or across the restricted area. And our  
18 instrument landing systems are geographically  
19 just north of the restricted area. We feel that  
20 it's going to be an additional problem for us  
21 and for our approaches. We've already been  
22 denied on many, many occasions approaches to our  
23 SDF into Marshfield.

24           THE MODERATOR: One minute, sir.

25           HAROLD GAIER: And we feel that this

## RESPONSES TO COMMENTS

53

1 may -- may be an additional problem for us. I  
2 guess in summary, it certainly hasn't been good  
3 for general aviation. We -- the last meeting I  
4 had a map showing 1971. The only thing that was  
5 out here from the military standpoint was  
6 69.04. All of these MOA's have developed since  
7 then, and now they're asking for more. I'm  
8 concerned about the quality of life in Mid  
9 Wisconsin, and I think it's pretty tragic that  
10 we're even here tonight. Thank you.

11 THE MODERATOR: Thank you for your  
12 comment. The next commenter is Walter Embke.

13  
14  
15 WALTER EMBKE: I think I'll refrain  
16 from commenting. My comments are similar to Mr.  
17 Gaier's.

18 THE MODERATOR: Okay, thank you. The  
19 next commenter is Lois McMahon, followed by Pat  
20 Conway.

21  
22  
23 LOIS MCMAHON: Mr. Simonson, ladies  
24 and gentlemen, I'm here as a concerned private  
25 citizen. My name is Lois McMahon and I live in

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 Wisconsin Rapids, and I'm a tax payer in Wood  
 2 County. I don't feel that the State of  
 3 Wisconsin can afford to give up this large tract  
 4 of recreational county land. And more  
 5 importantly, I don't think Wood County can  
 6 afford to part with it. I would hope that the  
 7 Air National Guard can find another solution for  
 8 their problem. And I would like to just go on  
 9 the record as being opposed to this expansion.  
 10 Thank you.

11 THE MODERATOR: Thank you, ma'am, for  
 12 your comment. The next commenter is Pat Conway,  
 13 followed by -- I'm not sure Sue Silvermarie.

14  
 15  
 16 PAT CONWAY: My name is Pat Conway, I  
 17 live in Ontario. And Sue Silvermarie and I  
 18 represent the Coalition for Peaceful Skies. It  
 19 was a waste of tax payers money for the Air  
 20 Force to have spent at least a million dollars  
 21 on preparing this EIS without looking first at  
 22 the legality of their land acquisition plan.  
 23 Our comments tonight will show the three options  
 24 presented in the EIS for acquiring the 6,200  
 25 acres of Wood County forest land is beyond the

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



## RESPONSES TO COMMENTS

55

1 realm of legal possibility. Therefore, the only  
2 way the federal government can acquire that land  
3 is through federal condemnation.

4 In April of 1997, I asked Senator  
5 Feingold to make a formal inquiry into the  
6 question of condemnation of county forest land  
7 for the hardwood expansion. On May 6, the  
8 Senator wrote me back, and he said that he  
9 requested from the Air Force an explanation of  
10 condemnation. And the Air Force -- he included  
11 the Air Force's response. They said it is  
12 premature to conclude that the proposed action,  
13 if it is followed, will involve condemnation  
14 because condemnation is not the only recourse  
15 available to proceed with a proposed action.

16 I'm here tonight, ladies and  
17 gentlemen, to tell you that it is not premature  
18 to be looking at condemnation. It is absolutely  
19 essential to be looking at condemnation in this  
20 EIS, and the Air Force must explain very clearly  
21 in the Final EIS how the condemnation procedure  
22 would go forward.

23 Let's look at why the only possible  
24 way the Air Force can acquire our county forest  
25 land is through condemnation. In the Draft EIS,

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 1

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

### Response to Comment No. 2

See response to Comment No. 1.

043HIV

Pat

Conway

1 the Air Force offers three possible options for  
2 acquiring land expansion. I'll discuss Option  
3 1, and Sue will look at Options 2 and 3.

4 Option 1 is to purchase outright the  
5 6,200 acres of Wood County forest land for the  
6 expansion. And according to this -- to the EIS,  
7 this expansion area would simply be withdrawn  
8 from the county forest land program. But let's  
9 take a first look at the existing county forest  
10 land that's included in our Hardwood Bombing  
11 Range in Juneau County.

12 Some of you may not realize that the  
13 existing bombing range in the Juneau County  
14 actually includes 3,400 acres of county forest  
15 land currently under lease to the federal  
16 government and currently being bombed and  
17 strafed. Now, as part of the expansion plan,  
18 the Air Force wants to purchase outright that  
19 tract of county forest land from Juneau County.  
20 So Juneau County is currently attempting to  
21 withdraw those 3,400 acres from the state funded  
22 program.

23 I stress the word "attempting."  
24 Because our state law requires that any land  
25 removed from the county forest program must be

## RESPONSES TO COMMENTS

57

1 put to a better and higher use, and that will  
2 benefit the people of Wisconsin as a whole. A  
3 group of twenty-three citizens is currently  
4 challenging the Juneau County withdrawal in  
5 court. We are submitting here tonight a copy of  
6 that lawsuit for the record to be included in  
7 the Final EIS.

-3

### Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

8 We believe that we're going to win our  
9 lawsuit, and that withdrawal is going to be  
10 declared illegal. Therefore, the Air Force must  
11 condemn those 3,400 acres of Juneau County  
12 forest land if they wish to purchase that land  
13 outright. And be assured that the people of  
14 Wisconsin will fight tooth and nail in the  
15 courts and through our political process to make  
16 sure that any withdrawal of county forest land  
17 to be used as a bombing range will not be  
18 permitted.

-4

### Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

19 To give you a idea of the seriousness  
20 of our fight to prevent the county forest's  
21 withdrawal in Juneau County, I'll read from  
22 statements of two petitioners. The first is  
23 Mary Brazeau Brown you heard earlier. She's a  
24 board member of the Department of Agriculture,  
25 Trade, and Consumer Protection. And she says,

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## RESPONSES TO COMMENTS

58

1 this issue of county forest withdrawal is  
2 precedent setting and should be consistent with  
3 the intent of county forest law.

4 Then we have Michael Schmidt, the  
5 president and CEO of St. Joseph's hospital in  
6 Marshfield. He says, the county forest  
7 withdrawal and the increase in the hardwood  
8 bombing range will expand the military aircraft  
9 operations in this area. This increased  
10 activity will impact the ability of the  
11 emergency medical transportation helicopter at  
12 St. Joe's Hospital to fly through this area.

5

13 So we have two leading members of our  
14 community that are directly opposed to this  
15 withdrawal in the Juneau County forest process.  
16 Now let's look at the ridiculousness of the  
17 option to withdraw the Wood County forest land  
18 needed for the expansion of the range.

19 It is clear that Wood County has voted  
20 to refuse to even attempt to withdraw the land  
21 and sell it to the military. The DNR has stated  
22 that if there's no application to withdraw,  
23 there can be no withdrawal. Therefore, the only  
24 option for the Air Force is to condemn the  
25 land.

6

### Response to Comment No. 5

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

### Response to Comment No. 6

Section 28.11(1) of the Wisconsin Statutes does not specifically state that military use of county forestlands is authorized or prohibited. In the past, the Wisconsin Attorney General's Office has stated that lack of specific statements giving authorization is a shortfall. One Attorney General stated this could be remedied by "either legislative amendments or the expansion of existing military establishments." Clearly, the pursuit of the expansion is what is now being addressed. However, this prohibition against use does not stop the withdrawal of the lands from the County Forest Law Program and sale of the lands for range expansion. That decision will be based on the results of the environmental studies. If a decision is made to expand the range, the county and the Wisconsin's Department of Natural Resources will be involved in the withdrawal process.

RESPONSES TO COMMENTS

59

1           So let's forget the notion that  
2           somehow the federal government could legally  
3           purchase outright any county forest land in  
4           Wisconsin for a bombing range. It simply can't  
5           be done because it's clearly forbidden by our  
6           State Statute 28.11. Thank you.

7

7           THE MODERATOR: Thank you for your  
8           comment. Sue Silvermarie, followed by David  
9           Schmick.

10

11

12           SUE SILVERMARIE: My name is Sue  
13           Silvermarie. I live at Route 1, Box 220,  
14           Ontario, Wisconsin 54651. I'm continuing what  
15           Pat began. Options 2 and 3 for land acquisition  
16           involve lease agreements. So taking a closer  
17           look at the legality of leasing county forest  
18           land for military purposes, we will be  
19           submitting here tonight for the public record  
20           four attorney general's opinions on the question  
21           of leasing county forest land to the military.

22           The clearest attorney general's  
23           opinion on this question is from Bronson  
24           LaFollete. He states, use of county forest  
25           lands for military maneuvers is not expressly

GROSSBIER & ASSOCIATES, INC. 800-706-0691

Response to Comment No. 7

See response to Comment No. 6.

1 authorized in Section 28.11. And multiple use  
 2 of county forest lands is limited to production  
 3 of forest products, recreational opportunities,  
 4 wildlife, watershed protection and stabilization  
 5 of stream flow. Therefore, use of county forest  
 6 lands for military maneuvers is not permissible  
 7 under Section 28.11. That's the end quote from  
 8 LaFollete.

9 We're also submitting tonight the  
 10 legal analysis of the Juneau County lease done  
 11 by the law firm of Dorsey and Whitney from  
 12 Minneapolis. It concludes, our independent  
 13 analysis of Wisconsin law leads to the same  
 14 conclusion, the Wisconsin Air National Guard's  
 15 use of county -- Juneau County forest land for  
 16 military purposes has been, and continues to be,  
 17 illegal. In addition, Juneau County knew or  
 18 should have known of this illegal use of its  
 19 forest land, and it thus improperly received  
 20 state payments while this inconsistent use was  
 21 continuing. End quote.

22 So it appears that the current lease  
 23 is illegal for the Juneau County forest land on  
 24 the existing range, and the withdrawal of the  
 25 Juneau County land is forbidden by State Statute

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Section 28.11(1) of the Wisconsin Statutes does not specifically state that military use of county forestlands is authorized or prohibited. In the past, the Wisconsin Attorney General's Office has stated that lack of specific statements giving authorization is a shortfall. One Attorney General stated this could be remedied by "either legislative amendments or the expansion of existing military establishments." Clearly, the pursuit of the expansion is what is now being addressed. However, this prohibition against use does not stop the withdrawal of the lands from the County Forest Law Program and sale of the lands for range expansion. That decision will be based on the results of the environmental studies. If a decision is made to expand the range, the county and the Wisconsin's Department of Natural Resources will be involved in the withdrawal process.

RESPONSES TO COMMENTS

61

1 28.11. Therefore, in order to expand the range  
2 the Air Force must condemn the 3,400 acres of  
3 Juneau County land and then condemn another  
4 6,200 acres of Wood County forest land. That's  
5 nearly 10,000 acres of our public forest that  
6 federal government would have to condemn for  
7 this expansion plan to move forward.

8 The final draft of the EIS has to  
9 acknowledge this indisputable fact. It has not  
10 done so. And the Air Force must give a clear  
11 justification for its violation of our state  
12 law, and an explanation of how condemnation of  
13 our forest land will proceed.

2

14 There's been some talk of Patriotism  
15 at these hearings. I've noticed, it seems -- it  
16 seems to me that love of this land which is what  
17 patriotism means is best demonstrated by  
18 protecting it. I would like to close by  
19 submitting to the record a poet's view, a  
20 patriotic poet's view.

21 Brothers and sons, we call you to  
22 arms, to the arms of our mother. Can you not  
23 see we're related even to trees, our pledge of  
24 allegiance to the whole earth family? Your  
25 vision so cramped and narrow you can't see the

GROSSBIER & ASSOCIATES, INC. 800-706-0691

**Response to Comment No. 2**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

62

1 forest.

2 Yes, your range needs expansion, and  
3 your arms want more than weapons. We call you  
4 to arms so compassion can be wedded to power.  
5 We call you to open your arms to remember women  
6 never birth enemy faces.

7 Brothers and sons, the defense we need  
8 is for our forest, our natural resources. The  
9 future we need for your children, for all of the  
10 faces women birth, is a future free of fear, a  
11 countryside of holy trees and harmony, and  
12 harmony.

13 I pledge allegiance to the earth, and  
14 to the flora and fauna and human life that it  
15 supports, one planet indivisible, with safe air,  
16 water and soil, and forest, economic justice,  
17 equal rights, and peace for all. Thank you.

18 THE MODERATOR: Thank you for your  
19 comment. David Schmick, followed by Mike  
20 Wipfli.

21

22

23 DAVID SCHMICK: My name is David  
24 Schmick and I live at 2920 - 5th Street South,  
25 in Wisconsin Rapids. And I'm a firm believer in

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



## RESPONSES TO COMMENTS

63

1 a strong military, but I also believe it's the  
2 military's responsibility to go along with the  
3 wishes of the people, wishes of the majority of  
4 the people.

5 I believe that the proposed expansion  
6 area is a major recreation area, hunting,  
7 fishing, hiking, and many, many other uses. And  
8 I wish to speak against this expansion. There's  
9 going to be a tremendous amount of additional  
10 noise.

11 This area has a lot of shift workers.  
12 I know, I live in Wisconsin Rapids. And when  
13 I'm working eleven to seven shift, I woke up  
14 just from the strafing runs that are going on on  
15 the current bombing range. And so I can imagine  
16 what it's going to be with the proposed  
17 expansion.

18 Also, the preservation of the proposed  
19 expansion land for recreational use for this  
20 generation and the next should be a top  
21 priority. The large amount of public land in  
22 this area is what makes this an excellent area  
23 to live in. These lands are highly used by area  
24 residents and nonresidents also, and also brings  
25 a lot of people in, and a lot of money in this

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 1

Noise levels associated with operations that would be conducted if the proposed action were implemented are compared with current conditions in Table 4-1 of the EIS.

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

045HV

David

Schmick

## RESPONSES TO COMMENTS

64

1 area because the people do come here for the  
2 recreation uses.

3 In final comment, I believe the  
4 government is supposed to be by and for the  
5 people. And most people of this area do not  
6 want this expansion, and we feel we're being  
7 ignored by the government. Therefore, we  
8 shouldn't be getting this expansion shoved down  
9 our throats.

10 One other thing I'd also like to bring  
11 up, a lot of people aren't aware of, is of all  
12 of the public federal lands that are being  
13 turned over to the UN at this point. There's a  
14 high number of them being turned over, and  
15 citizens aren't even being allowed to step foot  
16 on these properties. And that could be  
17 something, you know, in the future who's to say  
18 this won't be shut down and all this big  
19 expansion of land being just closed off to  
20 people and no one being allowed on it. And  
21 that's another concern. Thank you.

22 THE MODERATOR: Thank you for your  
23 comment. Mike Wipfli, followed by Dale Gray.

24

25

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

65

1 MIKE WIPFLI: My name is Mike Wipfli.  
2 I reside at 2425 Kimball Avenue, Nekoosa,  
3 Wisconsin. My main point of view comes from the  
4 standpoint me being a logger, hunter, nature  
5 lover, fisherman. I can recall twenty-five  
6 years ago being down in the Yellow River Bottoms  
7 hunting with a friend of mine, and wondering  
8 where all of this junk, metal junk and stuff  
9 came from. He said, oh, that's from the bombing  
10 range, from the jets, and I thought it was real  
11 neat then.

12 Now I kind of wonder, all of this  
13 stuff is going to be falling out of the sky down  
14 the Yellow River Bottom. Now it's going to be  
15 falling out of the sky all around this area  
16 because these military excursions are going to  
17 be coming from all directions.

18 I can recall loading wood five to ten  
19 miles away from the bombing range, and out of no  
20 where, before you even realize what's happening,  
21 a deafening noise comes, and it drives you right  
22 into the ground. I mean, it's a deafening  
23 noise, and it just drives your -- and then you  
24 see a jet go by.

25 I mean, it's -- it's something, you

GROSSBIER & ASSOCIATES, INC. 800-706-0691

Response to Comment No. 1

Objects falling from military aircraft using the Hardwood Range or its associated airspace would be an extremely unusual and rare occurrence.

036RV

Mkr

Wipfli

## RESPONSES TO COMMENTS

66

1 can't comprehend unless you've seen it. And  
2 this is happening in one direction now. Soon  
3 it's going to be all around this area. People  
4 don't realize what's going to take place.

5 Better sites are available. We all  
6 know that. There are sites that have been --  
7 bases that have been abandoned. They could be  
8 better utilized. They're not that far away. A  
9 jet travels incredible amount of distance in a  
10 short amount of time. And as far as the costs  
11 for that jet to travel a bit further, as a tax  
12 payer, I would love to see some of my money  
13 going to a good purpose such as that to get  
14 those jets away from this pristine, natural  
15 scenic area, and let them do their thing  
16 somewhere else.

17 The Wood County forest lands,  
18 mitigation is impossible. They cannot be  
19 replaced. There's no amount of acreage  
20 available in one block which could be sold or  
21 purchased to facilitate this. It's just  
22 impossible.

23 Reading the Environmental Impact  
24 Statement or the draft of it, there were --  
25 there was much -- there was some writing

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 3

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

## RESPONSES TO COMMENTS

1 regarding environmental hazardous, noise,  
 2 effects on wildlife, land, etcetera, but there  
 3 was no scientific evidence, statistics, or  
 4 anything to back it up, no data to back it up.  
 5 That's what needs to come out.

4

6 We heard about the multiple  
 7 approaches. Right now I believe it's just one  
 8 approach from the west. These approaches are  
 9 going to be from all directions. That's going  
 10 to magnify the effects of this tremendously.  
 11 And we've heard lots of reasons already why the  
 12 expansion is totally illegal, both by state and  
 13 federal laws. It violates state and federal  
 14 criteria, and shouldn't even be considered.  
 15 Except for the fact that this is the military,  
 16 and I guess they're above it. Thank you.

5

17 THE MODERATOR: Thank you for your  
 18 comment. Dale Gray, followed by David Draves.

19  
 20

21 DALE GRAY: Good evening ladies and  
 22 gentlemen. My name is Dale Gray. I live 7475  
 23 Batterman Road, Babcock, 54413. I am one of the  
 24 landowners that's being affected by the proposed  
 25 expansion. I have a letter here from the

GROSSBIER & ASSOCIATES, INC. 800-706-0691

Response to Comment No. 4

The research completed to support the preparation of the Hardwood Range EIS follows the use of various accepted scientific methodologies used to analyze pertinent potential impacts. These analyses have been prepared by qualified scientists and engineers who perform these services for a variety of customers, including the ANG. Copies of all material used in the preparation of the EIS is available on reserve at the Mauston, WI public library.

Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

68

1 Department of Military Affairs dated November  
2 16, 1987. We've been on this teeter-totter in  
3 the middle wondering which end is going to go  
4 down for ten years now, and probably another  
5 five to seven years maybe.

6 This letter that is dated the 16th, it  
7 says, you're certainly aware of the Wisconsin  
8 Air National Guard's plan to provide better  
9 military training for our pilots in conjunction  
10 with the objectives of noise abatement and  
11 safety. This requirement necessitates an  
12 expansion of the current Hardwood Air-to-Ground  
13 Weapons Range into part of Wood County.

14 Contingent upon federal approval, we  
15 will propose to offer you fair market value for  
16 your property and, in addition, to help in  
17 relocation costs should you desire to move.

18 What are we going to have for an  
19 option? They're going to buy us out. They're  
20 going to let us live there for free? I don't  
21 think so. We're going to have to get out.

22 The next letter that I received from  
23 them is the 3rd of December, 1987. It says,  
24 Dear Mr. Gray: Due to the reluctance of some of  
25 the landowners to sell, Wisconsin Air National

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

69

1 Guard has constricted the size of the proposed  
2 range. The area currently under consideration  
3 no longer involves your property. I sincerely  
4 hope that this endeavor has not caused you undue  
5 distress. Instead of undue stress.

6 And it's causing me stress. See me  
7 shake? I'm just sick and tired of the Air Force  
8 playing games, not telling you nothing. They  
9 send this Draft EIS study out there. A sixth  
10 grade kid could have wrote it. They use words,  
11 abatement, probability. They don't nail of  
12 nothing down definitely.

13 The first page that I -- that I want  
14 to bring up in the DEIS draft is Roman Numeral  
15 XIII, close Hardwood Range. This is the best  
16 alternative. Get out of Central Wisconsin.  
17 Wisconsin is supposed to be a tourist and  
18 recreational vacation spot.

19 We should not have to give up our  
20 county forest or our private lands for military  
21 bombing range in nearly the exact center of the  
22 state, which is Pittsville, fifteen miles north  
23 of the present range and about nine miles north  
24 of the proposed expansion area.

25 Wisconsin's population in 1950 was

GROSSBIER & ASSOCIATES, INC. 800-706-0691

Response to Comment No. 2

At this time, there are no plans, policies, or issues that would lead to the immediate closing or reduction in use of the Hardwood Range.

## RESPONSES TO COMMENTS

70

1 right around three and half million. I got the  
2 exact figures here. In 1990, it jumped to  
3 pretty near five million, an increase of nearly  
4 a million and half in Wisconsin. Now, do we  
5 need military bombing in the center of the state  
6 to take away our recreational areas? No, we do  
7 not.

8 They state that the costs of  
9 prohibiting moving units to other ranges, and  
10 they have this start at Page 217, don't show  
11 that much difference. I can't see where there's  
12 much difference. They also state that the units  
13 will have to have air refueling. Don't they  
14 need exercise and experience in air refueling  
15 before they have to go to war and possibly have  
16 to go to war?

17 It shows Hardwood unit going to  
18 Grayling. Now where have they got a unit at  
19 Hardwood? I don't know of any unit out at  
20 Hardwood. Can any of you guys in blue tell me  
21 that you got units out there? Where are you  
22 taking off from to go to Grayling? You don't  
23 have units at the Hardwood.

24 On Page 12, Air National Guard also  
25 reducing -- or Air National Guard also reducing

### Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 4

No units are stationed at Hardwood Range. Table 2-5 shows the distance from Hardwood Range to Grayling Range and other available air-to-ground ranges. Units with air-to-surface range training requirements will deploy to Volk Field to accomplish instrumented training. When that training is completed, such units may fly from Hardwood to Grayling Range or other available air-to-ground ranges to accomplish air-to-surface training. Therefore, the EIS has shown the distance from Hardwood and Grayling Range and others. There is no intended inference that units will or will not be permanently stationed at Volk Field.



1 in size, but at a slower rate. And the next  
 2 sentence says, as a result of Air National Guard  
 3 percentage of total, force active Air National  
 4 Guard Air Force Reserve is increasing. One  
 5 sentence says they're reducing; the next one  
 6 says they're increasing. Now, which one do we  
 7 go by? Is it contradicting?

5

8 Why ordinances? They say they don't  
 9 use any live ordinance out there. Mr. And Mrs.  
 10 Serrow, my next door neighbor, my self, Ralph  
 11 Longer, we hear the noise all of the time,  
 12 report of shells going off. Just a couple weeks  
 13 ago they had ground troops down there,  
 14 bbbbrrrrrrrrrttttt. Isn't that live  
 15 ammunition? It is in my gun, anyway, if I hear  
 16 a report like that.

6

17 THE MODERATOR: One minute, sir.

18 DALE GRAY: Now they're telling about  
 19 the hours of flights down there. They're saying  
 20 7:00 a.m. to 10:00 p.m. Then they turn around  
 21 and the next sentence it says approximately ten  
 22 percent of the flights will be from 10:00 p.m.  
 23 to 7:00 a.m. It says the majority 6:00 a.m. to  
 24 7:00 a.m. The word "approximately" again.

7

25 They aren't saying nothing definite in

## RESPONSES TO COMMENTS

### Response to Comment No. 5

Training for potential military conflict in time of peace is a reality recognized by the Congress and the President. As military forces are cut back, the quality of training for existing forces must be maintained and improved to ensure our nation has an effective military. As the active duty military force is reduced in size, the ANG role in the total force structure is increasing.

### Response to Comment No. 6

As noted in Subsection 3.3.4.1 of the EIS, only training or inert ordnance is used on the range. No "live" (high explosive) bombs or high explosive/incendiary gun ammunition is permitted. Furthermore, as discussed in Subsection 3.3.4.1 and further explained in Subsection 4.3.2 of the EIS, before any ordnance of any type is approved for use on a target on the range, the safety footprint associated with the aircraft, the ordnance, and the delivery tactic is analyzed in conjunction with range geography. These footprints encompass sufficient area to contain 99.99 percent of the delivered ordnance at a 95 percent confidence level. If necessary, constraints may be placed on delivery profiles to ensure that the footprint remains within range boundaries.

### Response to Comment No. 7

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 that Bible of theirs that they sent out to us.  
 2 If they're going to have flights twenty-four  
 3 hours a day, how is a hunter going to go in  
 4 there and hunt? They're not. They've also  
 5 stated that it's going to be open for this nine  
 6 days of deer season, but there will be planes  
 7 flying at 5,000 feet. Can you hear a deer run  
 8 through the brush if you got a plane going over  
 9 you at 5,000 feet? No, you can't.

10 There's approximately thirteen miles  
 11 of road it says. Then you turn around and look  
 12 at Port Edwards it says six point six miles;  
 13 Remington approximately two point four four  
 14 miles. That sure don't come up with thirteen  
 15 when I went to school. I can add different than  
 16 that.

17 THE MODERATOR: Sir, please bring your  
 18 comment to an end.

19 DALE GRAY: Pardon?

20 THE MODERATOR: Bring your comments to  
 21 an end.

22 DALE GRAY: Okay. Here's a map. This  
 23 is their present airspace that they have. This  
 24 is what they propose to add on to this. And  
 25 then the United States is going to look like

8

#### **Response to Comment No. 8**

There is no planned lateral expansion in the proposed action.

1 that. They just about got the United States  
2 blacked out. I got more here. If we have time,  
3 I'll give it to you. And I thank you for you  
4 are patients.

5 THE MODERATOR: Thank you for your  
6 comments. David Draves is a member of the Wood  
7 County Board. He will be followed by Dale  
8 Peterson.

9  
10

11 DAVID DRAVES: Thank you. My name is  
12 David Graves. I'm here representing the Wood  
13 County Board of Supervisors. I chair the county  
14 board ad hoc Hardwood Bombing Range Study  
15 Committee, and I also chair the Transportation  
16 and Economic Development Committee for Wood  
17 County.

18 I want to address some of the -- some  
19 of the items in that Socioeconomic Appendix No.  
20 1, I believe it is in the study. Because I  
21 believe it's clearly inadequate from the looks,  
22 socioeconomic economic impact to Wood County,  
23 bombing range expansion is going to be  
24 significantly detrimental to Wood County.

25 And I would like to go on record as

GROSSBIER & ASSOCIATES, INC. 800-706-0691

## RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 saying there are no benefits to Wood County with  
2 the expansion of the Hardwood Bombing Range into  
3 Wood County. It's been said many times here  
4 tonight that there is 6,132 acres of land that  
5 would be taken from Wood County. It's been said  
6 that there's no way to replace that land. I  
7 believe that statement to be true.

8 I do not believe that we will be able  
9 to replace that land in other areas of Wood  
10 County. The other townships simply cannot  
11 afford to have us do that because we will erode  
12 their tax books. It's almost impossible to do  
13 that.

14 The other thing that I want to address  
15 is the \$4,200.00 annually -- \$42,000.00 annually  
16 that they talked about in the Socioeconomic  
17 Impact Appendix. That is a minuscule amount.  
18 That is an amount that we would lose annually  
19 due to state road aids and timber sales.

20 They also talk about twenty-five  
21 million dollars a year in payroll that goes to  
22 the area of influence. One of the previous  
23 speakers tonight talked about Camp McCoy, and he  
24 talked about Volk Field, and the amount of  
25 dollars that would go to the State of Wisconsin,

Response to Comment No. 2

Based on additional data provided by the Wisconsin DNR, discussion of potential reductions in timber and paper products manufacturing and related activities associated with reductions in timber sale revenues in the expansion area have been added to the Socioeconomic Subsections 3.12 and 4.12 and to Appendix I.

Response to Comment No. 3

Portions of the \$25 million annual economic effect of Volk Field benefit Wood County. From 1990 through 1995, 40 percent of approximately \$10 million in construction contracts went to contractors in Wood County.

RESPONSES TO COMMENTS

75

1 that being in those two counties, Monroe County  
2 and Juneau County. The twenty-five million  
3 dollars annually, none of that would be accruing  
4 to Wood County.

5 So while we're doing our -- our  
6 patriotic duty expanding the range into Wood  
7 County, our neighbors, Monroe and Juneau County,  
8 will accrue substantial financial economic  
9 benefits. Wood County will have none.

10 We've heard from cranberry growers.  
11 We've heard from wood product industry. We've  
12 heard from the health care industry that this is  
13 going to be detrimental to expansion. We can't  
14 afford to have further erosion of industrial  
15 development in Wood County.

16 Marshfield, Wisconsin Rapids are the  
17 only two cities of their size in the entire  
18 state that do not have direct access to four  
19 lane highways. This severely impedes us in  
20 economic development because industry doesn't  
21 want to come into an area where they can't get  
22 their goods to market.

23 Now, in addition to this, they're  
24 going to erode the air transportation. We've  
25 heard people like Michael Schmidt from St.

GROSSBIER & ASSOCIATES, INC. 800-706-0691

Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 Joseph's Hospital say, I'm concerned about our  
 2 Spirit of Marshfield, the medical flights. But  
 3 he's also told us that he can't get to his  
 4 business meetings.

5

5 New industry like Advantage Learning,  
 6 I know the health care industry in Marshfield  
 7 can't get to their meetings because of the  
 8 existing flights over that bombing range.  
 9 What's going to happen if that gets -- if  
 10 there's further development? We cannot afford  
 11 to have that done. If they expand now with  
 12 seven thousand acres, what's to say that they  
 13 won't ask for more land in the future?

14 There are bases being closed. If they  
 15 need more training, why will they not think of  
 16 further expansion into Wood County. If -- if  
 17 they need more space for training, there is  
 18 land, there's federal land in Juneau County. Go  
 19 west of Highway 80, go into federal lands. If  
 20 there are problems with that, apply the same  
 21 rationales as you applied with problems of doing  
 22 that as to the problems of going into Wood  
 23 County.

6

24 We're one county. We're six  
 25 landowner. We look like the path of least

## RESPONSES TO COMMENTS

### Response to Comment No. 5

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

### Response to Comment No. 6

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 resistance. We will not give up our land. If  
2 the government is going to take this land, in my  
3 opinion, they're going to have invoke Eminent  
4 Domain. We will not give it up. Thank you.

5 THE MODERATOR: Before Mr. Peterson  
6 comes up, I see it's 9:00 o'clock. That's the  
7 time I said that we would adjourn. We do have a  
8 couple more comment cards here. And in regards  
9 to those who have scheduled other activities  
10 this evening, I'll take a vote to see if we  
11 should continue in this formal manner. And to  
12 those of you who must leave, I'll ask if you  
13 object to us continuing this session without  
14 you.

15 If you as a group decide to continue  
16 this comment session, I'll ask for comments for  
17 the next thirty minutes or whatever it takes to  
18 complete the cards. At the end of that time,  
19 I'll take another vote if necessary. So who  
20 would -- who would like to continue this formal  
21 comment period? It would appear that it's a  
22 majority.

23 And to those of you, if there is  
24 anyone that must leave, do you object to our  
25 continuing this comment period for another

1 thirty minutes? Hearing no objection, I'd like  
2 to take a five minute break, give the court  
3 reporter a moment here, and I'll reconvene in  
4 five minutes. Thank you.

5 (Whereupon a discussion was  
6 held off the record.)  
7  
8

9 THE MODERATOR: I welcome you back  
10 from the break. We're to start with the  
11 continuation of the formal presentations. Our  
12 next commenter will be Dale Peterson, followed  
13 by Richard Skifton, Jr.  
14  
15

16 DALE PETERSON: My name is Dale  
17 Peterson. 3111 - 12th Street South, Wisconsin  
18 Rapids. And I'd like to speak just as a  
19 sportsman or concerned citizen. I've been out  
20 hunting in this area. My dad took me out  
21 hunting in that area. It's a large block of  
22 woods, which, it's unique to Wood County.

23 I've been in different states, Texas,  
24 Oklahoma, North Carolina, Florida, all over.  
25 I've come back to Wisconsin because this is, you



RESPONSES TO COMMENTS

79

1 know, one of the best states there is. And one  
2 of the reasons I'm in Wood County is because  
3 this county is, you know, a good county. And we  
4 have got a lot of public lands available.

5 In this day in age, more and more  
6 private land being posted, no hunting, no  
7 fishing, houses being built, you know, out in  
8 the woods or out in the rural areas. Without  
9 these large tracts of public land, our  
10 grandchildren aren't going to have any places to  
11 hunt. And the number of hunters are diminishing  
12 all of the time. And I think that's something  
13 that we have to really look at is keeping this  
14 land for the public.

1

15 Another thing I'd like to comment on,  
16 which I don't think -- I'm sure people have  
17 thought about it, but Juneau County when they  
18 first put the initial Hardwood Range back in, I  
19 think they said 1952, I don't think they  
20 envisioned seeing the F16's and types of jets  
21 that are flying through it now. That's been  
22 what, forty-five years, fifty-five years, I  
23 guess? Now another fifty-five years from now, I  
24 mean, what kind of planes are going to be using  
25 this range or is it going to be missiles that

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

80

1 will be going through instead?

2           You don't know what to expect from the  
3 future. We kind of know what to expect what's  
4 flying through there now, and people are aware,  
5 you know, there's going to be a lot of changes  
6 in the future. I just think this land is just  
7 too valuable of an area to give up when there's  
8 other areas that can be used for their range.  
9 Thank you.

} 2

10           THE MODERATOR: Thank you for your  
11 comments.

12

13

14           RICK SKIFTON: My name is Rick  
15 Skifton, Jr. My family has lived in Wisconsin  
16 Rapids and Nekoosa since about 1967. Just a  
17 little background on me for anybody who cares.  
18 Right now I'm member of the Wisconsin Air  
19 National Guard. I have been since 1993. Before  
20 that, I spent about eight and a half, almost  
21 nine years in the Air Force. I was in Saudi  
22 Arabia and served during Desert storm.

23           I'm an air traffic controller, so I  
24 have an understanding of military aircraft,  
25 ranges, military operations areas, and

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

81

1 restricted areas. Just a little background.  
2 But I'm not here tonight as a guardsman. I'm  
3 here as a resident of Nekoosa where I live with  
4 my wife and two children.

5 And I think it's great that we have a  
6 forum like this where we can come up and voice  
7 our opinions and be involved. I also think it's  
8 important for us to be informed. I'm not an  
9 expert on the EIS. I'm in the Guard, but I'm  
10 not involved with it. That's not my area of the  
11 expertise, but I would like to address some  
12 things that I am familiar with.

13 First I've heard a lot of comments  
14 about the effects of the range expansion on the  
15 helicopter flights, the Medivac flights out of  
16 Marshfield. As an air traffic controller, we  
17 have an FAA, Federal Aviation order, that lists  
18 life guard helicopters, which is what the  
19 Medivac helicopter is when he's going to pickup  
20 a patient, as one of the highest priorities that  
21 there is. I mean, we've got -- it's way up  
22 there. It's not -- it's not a situation where  
23 he's just kind of blown off and has to go away.

24 Also, I think it's important for us to  
25 understand that when we're talking about the

### Response to Comment No. 1

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

RESPONSES TO COMMENTS

82

1 range, we're talking not about the range -- the  
2 range is within a restricted area, kind of like  
3 this piece of paper sitting on this podium. If  
4 I put a bigger piece of paper on the podium  
5 which would reflect the range, it doesn't mean  
6 the podium gets any bigger. I still -- I still  
7 have the same size podium, just a different size  
8 piece of paper. So the size of the restricted  
9 area will not change, the helicopter won't be  
10 affected by that.

11 And I've had, I guess, one occasion  
12 where I attended a county board meeting and was  
13 able to talk to the pilot of the helicopter.  
14 And he actually has a pretty good relationship  
15 with the Volk Air Traffic controllers. We try  
16 to help him out, get him what he needs. There  
17 are delays. I mean, things happen. We're  
18 talking coordination from the pilot to a  
19 controller, to another controller at Minneapolis  
20 center, back to the controller at Volk, back to  
21 the pilot. And that can take time.

22 I think there have been -- some of the  
23 delays at least have been caused by Minneapolis  
24 center and not the military. There have also  
25 been statements about the noise. And, without a

2

**Response to Comment No. 2**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1       doubt, there are times that it gets pretty  
2       loud. I mean, I work at the airport every day,  
3       and I know how loud it can get. Personally at  
4       home and at my parents' house, I've heard, I  
5       don't know, maybe a couple booms that I can  
6       remember in all of the time that I've been  
7       there, or been in this area.

8               I live right in Nekoosa. My children  
9       have never panicked because they heard the  
10      noise. I've never seen them jump out of their  
11      sandbox. My dog never barked until it lost its  
12      voice. But my children have jumped when they  
13      heard the steam releases out of the Consolidated  
14      or GP or trains coupling or unexpected car horn  
15      blasts. But I've never heard of any groups that  
16      have gotten together opposing GP or Consolidated  
17      or Wisconsin Central.

18             THE MODERATOR: One minute, sir.

19             RICK SKIFTON: Okay. I also  
20      understand the concern about the loss of land,  
21      and I can definitely sympathize with the people  
22      who are looking at losing their houses or losing  
23      their -- their land because of the expansion. I  
24      think if it was my land, I'd probably be slanted  
25      heavily towards opposition, too.

1           But the people who don't live in the  
2           area or don't use the land in the area but are  
3           still opposed, I wonder if they're equally  
4           opposed or were equally opposed to the  
5           acquisition of land by the government for four  
6           lane Highway 54 or expanding Riverview  
7           Expressway.

8           I think it's important that we as  
9           citizens stand up and make our opinions known,  
10          but I think we have the responsibility to be as  
11          informed as possible. Don't take anyone's word  
12          as gospel. People, myself included, when you  
13          get on an issue you're impassioned about, you're  
14          only going to speak about the things you're  
15          impassioned about. Be sceptical. Don't take  
16          anybody's word. Find out the answers for  
17          yourself. I'm not up here saying that I'm for  
18          or I'm against. I'm not praising or condemning  
19          anybody for being for or against.

20          THE MODERATOR: Please close your  
21          comment.

22          RICK SKIFTON: Okay. I just want us  
23          to be all open minded. Everyone needs to  
24          consider all sides of the issue and make  
25          rational decisions, base it on fact and not

## RESPONSES TO COMMENTS

85

1 scare tactics. Thank you.

2 THE MODERATOR: Thank you for your  
3 comments. That completes the cards that have  
4 been turned in tonight. Is there anyone else  
5 that wishes to speak? Would you bring it up  
6 here, please, or give it to a staff member? We  
7 got two. First commenter will be Steve  
8 Schwanebeck, followed by Dick Smith.

9  
10

11 STEVE SCHWANEBECK: Okay. I live in  
12 the Town of Sherwood. That's Clark County.  
13 Name's Steve Schwanebeck. I'm a town  
14 supervisor. Our farm -- the township is in one  
15 of the practice areas for the Air National  
16 Guard, has been twenty years, ever since it's  
17 been opened because we're northwest of the  
18 range. Now, currently, they're not flying  
19 anywhere near the flights over that we were  
20 getting ten, fifteen years ago. Which does  
21 bring into question as to why they need to  
22 expand if they're not using what they've always  
23 used.

1

24 We've never had problems with our  
25 cattle being scared. The kids -- kids in the

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 1

The necessity for this proposal results in part from the fact that aircraft, weaponry, tactics, and the military's size have changed over the last 10 to 15 year period. The military's needs are not based on the amount of land or materials. In the military's case, each aircraft would use virtually the entire range on each mission. Today's aircraft, weapons, and tactics require larger areas in which to operate when compared to the weapon systems or tactics used 10 to 15 years ago. The goal for the range is to have the flexibility to practice an attack of a target from a different attack axis. This is beneficial because, in battle conditions, a pilot will attack targets never having seen the surrounding environment. To increase the probability of first time success in actual battle conditions, the ANG needs to simulate an unfamiliar environment for the pilot as much as practical. The ability to attack a target from different axes helps achieve that end.

DSB:V

Steve

Schwanebeck

## RESPONSES TO COMMENTS

86

1 neighborhood, young kids do get bothered by  
2 this. My daughter was bothered by it. Other  
3 girls -- other kids in the neighborhood have  
4 been. I personally do not see a reason to  
5 expand this range.

6 There's other ranges available. The  
7 question of that they need to change their angle  
8 of attack is a question because you're attacking  
9 into an open field. I don't think you're going  
10 to find that in battle conditions. I don't see  
11 where a difference of an angle of attack should  
12 matter.

13 We have in the past -- right now the  
14 planes are respecting that five hundred foot  
15 minimum. That was a joke a few years ago. We  
16 were seeing planes at below a hundred feet on a  
17 regular basis over the buildings. I don't think  
18 you'll talk to any farmer in our neighborhood  
19 that can't tell you of a time a jet used us as a  
20 practice target on an assault -- on a run.

21 There is no reason to come in low over  
22 equipment. And it was a regular occurrence.

23 Now, maybe there's been a change.  
24 Maybe they are just giving us respect until this  
25 all gets turned over. And I don't see where

### Response to Comment No. 2

The ability to offer a variety of approach angles is a valid training requirement. Variations in angles of attack at a training range prevent pilot memorization of flight scenarios and offer more realistic training opportunities.

### Response to Comment No. 3

The ANG takes the public's concerns about pilot accountability very seriously. Any misconduct by a military pilot is a serious matter. If a member of the public is experiencing any problems with the military's operations in any of the airspace in the area that affects a person directly, the public affairs officer at the nearest military installation should be contacted immediately, or call (608) 245-4339.

The Federal Aviation Administration and each military service have very strict rules to ensure pilots stay within defined training airspace. The rules govern minimum altitudes, maximum speed, and type maneuvers that can be performed inside and outside designated training airspace. Military commanders have the authority to suspend pilots who willfully violate flight rules, such as flying outside designated training airspace. The military closely manages the airspace they use to ensure they do not exceed planned parameters.



## RESPONSES TO COMMENTS

87

1 you're going to change this grab of land, of  
 2 public land. There isn't any public land that  
 3 you can replace it with.

4 For awhile the idea as was to float  
 5 into the next township to our north and take  
 6 over a bunch of Town of Cary land. Well, that  
 7 land isn't available, and you can't touch any of  
 8 it for less than \$800.00 an acre. Because  
 9 that's what wild land in that area is going  
 10 for. This just seems to me to be a waste of  
 11 money.

12 THE MODERATOR: Thank you for your  
 13 comment. Next commenter will be Dick Smith.

14

15

16 DICK SMITH: My name is Dick Smith.  
 17 Route 4, Sparta, zip 54656. A few more things I  
 18 noticed missing from the DEIS. The business of  
 19 roads. They said if you're taking thirteen  
 20 miles of roads, I don't know if that's accurate  
 21 or not. But there has to be some discussion  
 22 about paying for those roads. Those roads  
 23 weren't built on federal highway funds. Those  
 24 roads were built by your ancestors with horses  
 25 and stone boats across swamp lands. What is the

GROSSBIER & ASSOCIATES, INC. 800-706-0691

**Response to Comment No. 4**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

**Response to Comment No. 1**

This issue is beyond the scope of this EIS.

052HV

Dick

Smith

## RESPONSES TO COMMENTS

88

1 price of a mile of road nowadays? Gets pretty  
2 expensive. So has to be some discussion on  
3 that.

4 One thing that's also missing is from  
5 all regulations, all requirements there should  
6 be a comprehensive range plan, there should  
7 always have been one, in regards to Volk Field  
8 and the Hardwood Bombing Range. This has to do  
9 with compatible land use and lists many factors,  
10 especially in the environment. There's no sign  
11 of a comprehensive range plan. We've asked for  
12 that six months ago.

13 Also the Aicuz, A-I-C-U-Z, Aicuz  
14 study. That has to be up -- done every two  
15 years and maintained, and that should include  
16 the range. It includes Volk Field runway, but  
17 not the range. But they're going to be  
18 considering new runway for the C130's that very  
19 -- it better include the range also, I think.  
20 If there's any requirement enforced, let it be  
21 those.

22 And I do want to say this is a NATO  
23 training facility. There's aircraft from  
24 probably six or more different other countries  
25 that train in there. And if you're -- with the

GROSSBIER & ASSOCIATES, INC. 800-706-0691

### Response to Comment No. 2

A Land Use Guidelines Plan for the range does exist (see Appendix K).

### Response to Comment No. 3

In accordance with Air Force Instruction 32-7063, Air Installation Compatible Use Zone (AICUZ) studies are only applicable to active runways. In addition, the number of operations on the proposed landing zone would also preclude the study.

## RESPONSES TO COMMENTS

89

1 air increase of aviation on commercial, about  
2 three and half percent a year, they got to fly  
3 around. They may be flying around Lake Michigan  
4 or Dubuque, Iowa just to get to Chicago because  
5 of some foreign aircraft is in there.

6 This is no longer the Guard where you  
7 had to buy your own uniform or make it or buy  
8 your own horse also, and our local militia.  
9 This is a global thing. This is the NATO Police  
10 Force. I don't remember my Congressman ever  
11 really voting on that. I'd like to know how  
12 that happened. There should be some discussion,  
13 at least more discussion how we became this  
14 global mission.

15 No wonder we're having militia groups  
16 throughout the country when they know they have  
17 to protect the community. In this case maybe we  
18 could use some of the militia up here and help  
19 us protect our new enemy, from our new enemy.

20 Another issue that should be dealt  
21 with before they go ahead with any new range and  
22 new land over here is the pollution at Volk  
23 Field and on the range. There are ten sites  
24 over there and most of them have contaminated  
25 ground water. And some of them they have been

### Response to Comment No. 4

This issue is beyond the scope of this EIS.

### Response to Comment No. 5

The proposed action focuses on expanding the existing Hardwood Range and assessing utilization of the associated airspace. No construction activities or operations and maintenance activities that could potentially cause a chemical spill are proposed for Volk Field under the proposed action. However, the defense Installation Restoration Program (IRP) project sites at Volk Field and the Hardwood Range continue to be studied and monitored. A Feasibility Study for these IRP sites was released in March of this year for public comment. The text has been modified to include this information.

RESPONSES TO COMMENTS

90

1 testing since the 1980's. Well, how many more  
2 years before they start cleaning it up?

3 Monitoring wells are not cleaning  
4 things up. That's not remediation. I think a  
5 year ago I talked to Captain Beck, who's a major  
6 now. He had said we simply don't have the money  
7 for that. Seems to me that Congress gave the  
8 Pentagon an extra seven billion dollars last  
9 year for a bunch of D2 bombers that nobody  
10 wanted. That's a lot of money. Well, let's  
11 cleanup Volk Field a little bit.

12 Whenever there's a major change in a  
13 military installation or equipment, that's the  
14 time to look at, well, let's clean up, let's do  
15 this. When Fort McCoy wanted a hazardous waste  
16 storage unit permit, they had to look at all of  
17 the dump sites up there. Why doesn't Volk Field  
18 have to do that also? That should be required  
19 before they go ahead with expansion business.  
20 There's PCB's over there dumped in from  
21 transformers dumped, 3,500 gallon jet fuels  
22 spilled.

23 THE MODERATOR: One minute, sir.

24 DICK SMITH: Which is paved over,  
25 PCB's are paved over. There's two airplanes

GROSSBIER & ASSOCIATES, INC. 800-706-0691

**Response to Comment No. 6**

See response to Comment No. 5.

6

202

1 went down in '64, '78, and they both left  
 2 plumes. One thing I want to say about  
 3 simulators. Simulators and the software that go  
 4 with the training of jets and stuff.

5 Technology is changing awfully fast.  
 6 Used to be a simulator would have to be in a  
 7 room at least this size. Now you can put it in  
 8 an office space. And the software that goes  
 9 with the training of F18 pilots, man that stuff  
 10 is changing fast.

11 The Air Force doesn't change that  
 12 fast. Takes them ten years to make a decision.  
 13 Maybe they'd better just wait a little while and  
 14 see if they really do need this. The F16, when  
 15 are they going to be obsolete because of the  
 16 F22s, which we all are going to pay for, of  
 17 course, but we don't get the money for it.

18 THE MODERATOR: Please bring close  
 19 your comments to a close.

20 DICK SMITH: Well, no wonder they had  
 21 B2 bombers because of the 435 Congressional  
 22 Districts, there are 385 Districts that make the  
 23 parts for it. This is the armed procurement  
 24 industry, folks, not the Air Force.

25 THE MODERATOR: Thank you for your

## RESPONSES TO COMMENTS

### Response to Comment No. 7

The use of flight simulators for pilot training is already part of the training program for various aircraft using the affected airspace. The F-16 training regulation (AFI 11-F16) stipulates those activities that may be accomplished using simulators and those requiring actual flying. Although flight simulators work well for certain types of training (e.g., emergency procedures and instrument training), the complete substitution of simulator training for all flight training is not a viable alternative. In addition, the availability of simulators for on-going readiness training is limited.

1 comments. It is now 9:28, the amount of time  
2 that we allotted for the extra. I have no more  
3 cards here for speakers. The Air National Guard  
4 representatives will be available to answer any  
5 individual questions you may have once we  
6 adjourn. I want to thank you sincerely and the  
7 Air National Guard representatives for your  
8 fairness in participating during this meeting  
9 this evening.

10 Please remember that you may also  
11 comment using the comment forms provided to you  
12 in the registration package. Comment period  
13 again is open until November 21, 1997. And I  
14 say again, your comments have been reported  
15 tonight and will be responded to in the Final  
16 Environmental Impact Statement when it is made  
17 available. Thank you and good night.


18 (Whereupon the Public Forum  
19 was terminated.)  
20  
21  
22  
23  
24  
25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## REPORTER'S CERTIFICATE

STATE OF WISCONSIN )  
COUNTY OF WOOD ) ss.

I, Cheryl J. Sisco, do hereby  
certify the foregoing to be a true and correct  
transcription of my stenographic notes taken in this  
action.

  
CHERYL J. SISCO

1

2

3 AIR NATIONAL

NATIONAL GUARD

4 GUARD

BUREAU

5

6

7

8 DRAFT ENVIRONMENTAL  
9 IMPACT STATEMENT  
10 ADDRESSING THE HARDWOOD  
11 RANGE expansion and  
12 ASSOCIATED AIRSPACE ACTIONS

10

11

12

13

14 Date: September 18, 1997

15 Time: 5:00 p.m. - 10:00 p.m.

16 Location: West Junior High  
17 Wisconsin Rapids, WI

17

18

19

PRIVATE FORUM

20

21

22

\* \* \*

23

24

25



## RESPONSES TO COMMENTS

1 Leon Engel  
2 2531 Duck Creek Lane  
3 Wisconsin Rapids, WI

4

5

6 MR. LEO ENGEL: I am 100 percent  
7 against it. I've been a Wood County taxpayer  
8 for all -- 50 years, \$5, and my tax money went  
9 to support the 6,000 acres or so that they want,  
10 and I feel I am entitled to it to hunt, fish  
11 trap, travel, watch the birds, or whatever, and  
12 to me this is mine. I'm part of it.

13 Last month, excuse me a minute. I  
14 have to -- Monday, September 8 at 1:30, there  
15 was a sonic boom. I was resting in my chair and  
16 it knocked -- pret'near knocked me right out of  
17 my chair. The windows rattled and I don't think  
18 I, I should be subject to that noise. In this  
19 area, pret'near every -- or there's a lot of  
20 people work the third shift, the second shift,  
21 that are sleeping these hours, and I'm sure it  
22 would scare them right out of their bed.

23 I hunt in this area, and the hunter  
24 sits there, listens to noises from the animals  
25 and whatnot, and these planes run, going over

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

1 back and forth, all you can hear is planes. I  
 2 am being violated every day. I can be in my  
 3 yard talking to somebody and once in awhile  
 4 these planes go over, the conversation ends.  
 5 You can't hear nothing.

6 Well, about two years ago I was camped  
 7 over at Warrens, Yellowstone Park, and there was  
 8 three or four jets come over so low it just  
 9 scared the tar out of me. I don't know if  
 10 you've ever heard it, but I can. It's just a  
 11 roar that shakes, and everything shakes and I  
 12 don't think I'm entitled to listen to that,  
 13 especially when they got plenty of area and Air  
 14 Force bases that they're closing down.

15 There's plenty of room out West, where  
 16 there isn't the population they have here. I  
 17 guess that's basically my beef. I don't want  
 18 them here, and I would offer this (indicating),  
 19 if I got to put up with the sonic booms, these  
 20 jets are likely to get hit by friendly fire. I  
 21 feel that bad about it. So, okay.

22 I guess that's basically what I want  
 23 to say, and I would say this, all of these  
 24 National Guard people and whatever, if they like  
 25 that noise, keep it over in their neighborhoods.

**Response to Comment No. 2**

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

**Response to Comment No. 3**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

**Response to Comment No. 4**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 Don't shove it onto me. I don't think I deserve  
2 this.

3

4

5 Robert Engel

6 12130 52nd Street

7 Wisconsin Rapids, WI

8

9

10 MR. ROBERT ENGEL: Well, first of all,  
11 I'd like to say that I think these meetings are  
12 a bunch of BS, because I think the Air National  
13 Guard is going through with it and it will be  
14 right down the public's throat whether we like  
15 it or not, and as far as I'm concerned the  
16 public doesn't have anything to say. We can say  
17 what we want to, but it isn't going to mean  
18 nothing.

1

19 As a citizen of this area, I pay taxes  
20 on this land for a good many years, and our tax  
21 money as far as I'm concerned is going down the  
22 drain. We paid for this property through the  
23 years, and now they're going to take it. We  
24 ain't going to get nothing out of it, regardless  
25 what the Air National Guard says. They said

#### Response to Comment No. 1

The ANG cares about the people that live near their training areas and how they feel about the activity associated with training. The NEPA process is providing the ANG with an opportunity to hear exactly what the public feels about its proposal before any decisions are made. Every scoping comment and every comment on the draft EIS sent to the ANG has been read and incorporated into the administrative record for the proposal. Public comments have provided a better picture of what subjects the public wanted addressed in the document and have enabled the ANG to improve the EIS by focusing attention on specific issues for discussions in the EIS.

0544V

Robert

Engel

## RESPONSES TO COMMENTS

Response to Comment No. 2

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

1 they were going to replace the land. Where are  
2 they going to get this land? They don't make  
3 land. Whatever land they get a hold of is open  
4 to the public now. } 2

5 I'm an avid hunter throughout the fall  
6 of the year. I've hunted this area through the  
7 years and it's so bad now when you go out and  
8 you flush a grouse, you can't even hear the  
9 grouse get up because of the noise from the  
10 airplanes in it. And that can take up my whole  
11 hunting day, with the noise. So it isn't  
12 enjoyable when you have to listen to this.

13 Well, I think I will leave it go at  
14 that before I say a few more things I don't want  
15 to.

16

17

18 Troy Brey

19 4520 74th Street South

20 Wisconsin Rapids, WI

21

22

23 MR. TROY BREY: I strongly oppose  
24 Hardwood's expansion into Wood County. That's  
25 all. To put it plainly, that's it. I strongly } 1

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

GROSSBIER

Troy

Brey

1 oppose it.

2

3

4 Richard L. Kautz

5 4631 11th Street South

6 Wisconsin Rapids, WI

7

8

9 MR. RICHARD KAUTZ: My name is Richard

10 L. Kautz of R.L. & R.L. Kautz Tree Farms of

11 Wisconsin Rapids, and I have been to the

12 meetings at Pittsville and I have received a

13 copy of the draft of the EIS statement, which is

14 I must say awfully thick, and it appears to me

15 that almost everything in there is for the

16 approval of this type of program that the

17 government would wish to do in Wood County.

18 I am a property owner in Section 32,

19 and as a property owner, I've had this for 19

20 years, the property, and we have put in a lot of

21 Christmas trees and pulp trees, planted pulp.

22 My son is the other partner in this venture.

23 Mostly though, we use the property in

24 the area of the expansion for our holidays,

25 which includes the picking of our own Christmas

## RESPONSES TO COMMENTS

1 tree for each family. There's four families.  
 2 Actually now, there's five families. We do the  
 3 bonfire thing, the camaraderie of family and  
 4 friends.

5 We do have our travel trailer and a  
 6 lean-to that we use for our jeeps and tractors  
 7 that we use on the land, probably more for  
 8 recreational purposes than the money that would  
 9 be involved in the sale of Christmas trees or  
 10 pulp.

11 My comment this evening would be to  
 12 the Air National Guard, and I know they've heard  
 13 this before, but there's a lot of land out West  
 14 and if they really want the environment of the  
 15 Wisconsin terrain, why not use the refuge, the  
 16 Necedah refuge which is already owned by the  
 17 government and/or the State of Wisconsin, and  
 18 therefore, use that. Thank you very much.  
 19 Richard L. Kautz. R.L. & R.L. Kautz Tree  
 20 Farm. Thank you so much.  
 21  
 22  
 23  
 24  
 25

**Response to Comment No. 1**

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

## RESPONSES TO COMMENTS

1 Gary Brey  
2 3110 Tanglewood Trail  
3 Wisconsin Rapids, WI

4

5

6 MR. GARY BREY: Okay. I would like  
7 just to say that I'm opposed to the bombing  
8 range for several reasons. There's too many  
9 other options they can go with and what they do  
10 down there is obsolete. They're -- even one of  
11 the big Air Force guys said that, commented on  
12 that in the paper here a while back and I don't  
13 think we need it. Okay.

1

14

15

16 Clark Snyder  
17 14711 Rangeline Road  
18 Nekoosa, WI 54457

19

20

21 MR. CLARK SNYDER: I would like to go  
22 on record as being opposed to the expansion.  
23 Some of my reasons are that I think it will  
24 adversely affect tourism, in the aspect of  
25 people who use the county forest land will be

1

**Response to Comment No. 1**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

05711V

Gary

Brey

## RESPONSES TO COMMENTS

1 stopped from using it for hunting and fishing  
 2 and just plane sightseeing.  
 3 I'm opposed also to the increase in  
 4 noise, and the increase in added safety factors  
 5 with increased flights. There will be more  
 6 probability of accident. I -- I don't -- I  
 7 don't like the intrusion into our private lives  
 8 with all of the noise and flights over our  
 9 houses. That's it. Thank you.

2

10  
 11  
 12 Clare L. Searles  
 13 P.O. Box 57  
 14 Babcock, WI 54413

15  
 16

17 MR. CLARE SEARLES: I would like to  
 18 state my opposition to the proposed expansion to  
 19 the Hardwood Range and as I have done in the  
 20 past. We are the largest private landowner in  
 21 the proposed acquisition. If it goes through,  
 22 we will lose all of our property, our  
 23 livelihood, which is the cranberry marsh.  
 24 We are the fifth generation cranberry  
 25 growers. We have three sons who would like to

Response to Comment No. 1

Hunting and fishing activities will continue to be a part of the operations of the Hardwood Range with consideration for safety being the primary limiting factor. Effects on tourism would be expected to be minor.

Response to Comment No. 2

As described in Subsection 3.3.3.1 of the EIS, the Class A mishap rates reflected in the document consider the life-time operational use of the aircraft, under all conditions of flight. Therefore, any mishap occurring during any phase of flight is reflected in the statistic. As discussed in the EIS, risks associated with aircraft mishaps is low.

A complete discussion of Class A mishap rates is contained in Subsection 3.3.3.1 of the EIS. Tabulation of statistical projections for Class A mishaps for each aircraft using the airspace associated with this proposal is presented in Subsections 3.3.3.1 and 4.3.3 for current and proposed use conditions, respectively.

OSBHV

Clark

Snyder



## RESPONSES TO COMMENTS

1       come back on the marsh. We can't even have that  
2       happen at this time because of the threatened  
3       expansion, which would take all of our land and  
4       all of our livelihood. I don't see the need for  
5       this expansion.

6               They have -- they've used this range  
7       since 1955. It has been adequate to meet their  
8       needs all the way up until this time. I don't  
9       believe that there's a need for any kind of an  
10      expansion. They had the range there when we  
11      purchased the property. There was no talk at  
12      that time of any kind of an expansion and I  
13      don't believe there is -- that they've shown  
14      that there is a need to expand into another --  
15      to double their size of their property.

16             That's all that I have to say. Again  
17      I, I stand in opposition of the expansion.  
18      Thank you.

19

20

21   Charlotte Searles

22   P.O. Box 57

23   Babcock, WI 54413

24

25

**Response to Comment No. 1**

Performance characteristics for military aircraft have changed dramatically since 1955. Higher speeds and more variety in mission tactics associated with today's military aircraft necessitate corresponding changes in training facilities for pilots flying modern aircraft.

**Response to Comment No. 2**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

0591IV

Clare

Searles

## RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1 MS. CHARLOTTE SEARLES: Okay. I'm  
2 just not in favor of the Hardwood Range going  
3 in. Our cranberry marsh is in the middle of it.  
4 Our whole 255 acres would be involved in the  
5 acquisition, but that's not the only reason.  
6 There's a lot of hunters out on Batterman Road,  
7 and the whole area around our marsh. There are  
8 a lot of snowmobilers in the winter, a lot of  
9 duck hunters. We've had a bear out there a  
10 couple of weeks ago. We had a lot of wildlife.  
11 We enjoy living out there. We don't want to see  
12 it go.

13 We have a great place to grow  
14 cranberries. It's all natural. It's not  
15 wetland. It's really, we don't want to see it  
16 go in and we will fight it just as much as we  
17 possibly can. We have lawyers working on this  
18 now. We're not going to sit back. We don't see  
19 how it's possible with so much opposition to it  
20 going in. It seems dangerous with the casino as  
21 close as it is and the amount of time that  
22 people spend there.

23 I guess that's all I can just go on  
24 record saying, we very much oppose having the  
25 marsh included in this acquisition. We have

OGCIV

Charlotte

Searles

1 three sons in cranberries, none of them with us,  
2 because we don't know what's going to happen.  
3 They're growing cranberries in two other  
4 countries and then in Wisconsin because we don't  
5 know what the future holds for us. We hate to  
6 bring kids in, you know, and say in two years  
7 you're out, we're out of here. We don't have  
8 anything else to do here.

9 So it's not a good way to live. It's  
10 very stressful. It has been stressful ever  
11 since we started. We started with probably 15  
12 acres and when we found out about this going in  
13 and we just kept coming, because we don't know  
14 what's going to happen. If it's going to stop,  
15 if they're going to keep expanding, then we're  
16 going to want to have -- if the expansion  
17 doesn't go in, we will be glad that we kept  
18 going, but we're going so slow because of the  
19 expansion. That's all. That's it.

20

21

22 Violet Prihoda

23 Route 4, Box 290A

24 Sparta, WI 54656

25

## RESPONSES TO COMMENTS

1  
2 MS. VIOLET PRIHODA: My name is Violet  
3 Prihoda. I'm here tonight because I've been  
4 involved with the learning of this proposal for  
5 several years. However, I did not receive a  
6 draft EIS. My name is eliminated. Somehow I  
7 never received a postcard that they were  
8 supposed to send out and I know many other  
9 people never received it. So how they  
10 eliminated many of our names is questionable.

1

11 And -- but so, since I have been here,  
12 I have been reviewing my friend's EIS and came  
13 up with a few things that I was concerned about  
14 and I only had a short time to review it. So  
15 some of my concerns are, when you're creating a  
16 wartime environment to train in, have you  
17 evaluated the human response to that. I know  
18 what those conditions do to me when I'm near the  
19 range. It just creates madness and I just don't  
20 see anywhere where they took the human response  
21 serious enough.

2

22 And I don't see any real air space  
23 evaluation in here. You want more space, but  
24 why? What are the needs? Current evaluation of  
25 air space needs I think is -- needs to be

3

**Response to Comment No. 1**

All persons who requested copies of the Draft EIS were mailed the document promptly upon its availability, with the initial mailings going to all those who returned postcards updating their interest in this action. Subsequent requests during the 90-day comment period were also responded to promptly. All those persons who's comments on the Draft EIS appear in this Volume will receive the Final EIS.

**Response to Comment No. 2**

A discussion of human health effects is included in Subsection 4.13 of the EIS.

**Response to Comment No. 3**

The need for this proposal is addressed in Section 1 of the EIS. The ANG's proposal is to have an air-to-surface range 7 NM by 5 NM to accomplish the most realistic air-to-surface weapon delivery training possible. The current range is only 2 NM by 6 NM. Because the ANG is operating in airspace that is well short of this need, the ANG is not able to accomplish training as effectively as possible.

0613V

Violet

Prihoda

RESPONSES TO COMMENTS

14

1 addressed more thoroughly and interested parties  
2 updated newsletter sought it here, in the draft  
3 EIS. Never heard of such a thing. Nobody I  
4 know has received in the last three years -- had  
5 ever received any updated newsletters. It's  
6 kind of a mystery. We talked about it and never  
7 heard anything about it. And I'm just -- say no  
8 to this black hole in Wisconsin. So no  
9 expansion. That's it for now. Thank you.

4

Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

10

11

12 David L. Janssen

13 5220 32nd Street South

14 Wisconsin Rapids, WI

15

16

17 MR. DAVID JANSSEN: What kind of  
18 problems, any and all, I might start out by  
19 saying, I work in a safety sensitive area for  
20 our utility, and I might add that we  
21 communicate, and communication is real important  
22 in the type of work that we do, and there are  
23 days when we cannot communicate very well. In  
24 fact, there are days we can't hear each other  
25 when we're outdoors, which is where we work a

GROSSBIER & ASSOCIATES, INC. 1-800-706-0691

RESPONSES TO COMMENTS

15

1 lot out in, in, what shall I say, public utility  
2 territory.

3 So I'm going to go on record as  
4 saying, I don't care to have any excessive noise  
5 at work nor do I care to have any excessive  
6 noise when I come home in the evening when I'm  
7 stressed out, which is what I have had. I live  
8 in the Town of Grand Rapids. I don't know where  
9 the air corridors are or anything else and the  
10 reason I'm here tonight is because of stress.

11 I have been out in Tanglewood,  
12 Wildwood, doing safety sensitive work, and I've  
13 had -- I've got dates, times and places, by the  
14 way, recorded. I've had aircraft from 9:00 in  
15 the morning until 11:00 while I was doing this  
16 work and quite frankly it startled me.

17 It's the type of work you have to  
18 remain focused. I could have choked whoever it  
19 was, and there are times when there's an  
20 individual and a wing man which is even worse,  
21 and specifically, earlier this spring on Church  
22 Road, Ranger Road, Town of Saratoga, et cetera,  
23 and I just guess I want to go on record as  
24 opposing any further expansion.

25 I moved here from Milwaukee, and we

**Response to Comment No. 1**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

RESPONSES TO COMMENTS

16

1 had flights pass over from Billy Mitchell, those  
2 weren't as loud as where I lived in Big Bend as  
3 these are here, after working 35 years, and  
4 spending an eighth of a million dollars on an  
5 exclusive subdivision property, I feel as though  
6 I have made a huge mistake. I should have gone  
7 somewhere else after moving seven times in five  
8 years. I'm 53 and I'm about ready to think of  
9 retiring.

10 So if that means, if this goes through  
11 and I have to sell my property, and I'm not  
12 going to get out of it what I put into it,  
13 that's too bad for me. I guess that's about all  
14 I would like to say. Thank you.

15  
16  
17 Gary G. Vanatta  
18 412 Daly  
19 Wisconsin Rapids, WI

20

21

22 MR. GARY VANATTA: I would like to  
23 speak in opposition to this project. I'm a  
24 former military person, field grade officer in  
25 the Army Corps of Engineers, reserve. I have an

}  
- 1

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

06/30/94

Gary

Vanatta

RESPONSES TO COMMENTS

17

1 understanding of the relationship of the Air  
2 Force and the Army and what's afforded to the  
3 military through Fort McCoy. I believe the  
4 facilities exist already in the immediate  
5 proximity and I see no reason to invade the  
6 woodlands of Wood County to duplicate facilities  
7 that already exist. End of statement.

8

9

10 Michael H. Speich  
11 1940 Bassett Place  
12 Wisconsin Rapids, WI 54494

13

14

15 Yes. I'm here tonight to, you know,  
16 to make claim in opposition to expansion of the  
17 Hardwood Range into Wood County. I, Mike  
18 Speich, as a representative on the Wisconsin  
19 Rapids city council, and also as an individual  
20 and taxpayer of the State of Wisconsin, and a  
21 resident of Wood County, and the City of  
22 Wisconsin Rapids.

23 I do believe that it will impact us in  
24 the loss of, you know, the county land, forest,  
25 recreational purposes. It will change the

**Response to Comment No. 1**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

- 1

064HV

Michael

Speich



## RESPONSES TO COMMENTS

1 impact to our airport expansion and the present  
 2 use to our airport. I think that the gain for  
 3 the county as a whole economically is nil to  
 4 none. We see no long-term benefit from it, the  
 5 loss of, you know, the noise, the factors, you  
 6 know, all the un- -- you know, all the village,  
 7 you know, all the regulated space that would be  
 8 lost will be also in a negative.  
 9 I firmly believe here today that there  
 10 are other places that, you know, this expansion  
 11 could be taken on with open arms in Northern  
 12 Michigan, Sawyer Air Force Base, or wherever,  
 13 but I'm here today in opposition of this  
 14 expansion and go on record. Thank you.

15

16

17 Lynn J. Young

18 Route 1, Box 266

19 Camp Douglas, WI 54618

20

21

22

23 MR. LYNN YOUNG: Okay. The hearing  
 24 tonight was about the environmental impact of a  
 25 proposed expansion for Hardwood Range. I

Response to Comment No. 2

All airspace actions initiated by the ANG are coordinated with the FAA to ensure there are no adverse impacts to civilian airspace or airport utilization.

1 believe that the current environment at the  
 2 current Hardwood Range would be a good  
 3 indication of what the environmental impact on  
 4 expansion would be. I don't think very many  
 5 people have taken the time to go to Hardwood and  
 6 really drive around the acreage and look.

7 There's a very healthy eco-system at  
 8 the current Hardwood Range. There are many  
 9 variety of wildlife living there that are not  
 10 detrimentally affected by the operations of  
 11 Hardwood. I've also not heard anyone mention  
 12 that the Karner blue butterfly, which is an  
 13 endangered species, has one of its healthiest  
 14 populations in the state at Hardwood Range.

15 I hope that the people who study the  
 16 actual environmental impact have taken the time  
 17 to truly look at what's currently going on with  
 18 the environment at Hardwood. I think this would  
 19 be a good indication of what might happen with  
 20 an expansion. That's it.

21

22

23 (Whereupon, the proceedings

24 terminated.)

25 \* \* \* \* \*

#### Response to Comment No. 1

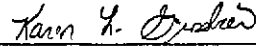
Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

REPORTER'S CERTIFICATE

STATE OF WISCONSIN )  
                          ) ss.  
COUNTY OF WOOD        )

I, Karen L. Grossbier, do hereby  
certify the foregoing to be a true and correct  
transcription of my stenographic notes taken in this  
action.

  
\_\_\_\_\_  
KAREN L. GROSSBIER

SEP 18 1997

# Written Comment Form

## DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Morris R. Brockman  
TITLE/ORGANIZATION: Cranberry Grower  
ADDRESS: 3787 Hambro Trail Wise Ridge Wis 54495  
(Street) (City/State/Zip)

### - COMMENTS -

I continue to voice my opposition to the proposed Hardwood Range expansion. There are no major benefits to be received by Wood County and the county forest land that would be taken is priceless and cannot be replaced.

The private land that would be taken would create hardships for the owners. The Goshung Marsh involved could not be relocated in view of all the environmental laws.

I would like to see the Hardwood Range moved to a different area where they could build a training area of about 200 square miles where there wouldn't be so much wetland impacted.

Financing for doing this shouldn't be a problem as Congress voted almost unanimously to give the ANG everything they wanted.

I feel the EIS the ANG drafted falsely minimized the impact it would have on the environment as well as the economy of Wood County.

There have been a lot of military plane crashes lately, and it would be disastrous if this happened in Wood County.

1  
2  
3

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Acquisition of private lands (if that is the decision and subsequent course of real estate action), including a cranberry business, would be based on the appraised value of the property and improvements, and would consider prevailing market conditions such as the availability and cost of similar lands in the area.

### Response to Comment No. 2

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

### Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Please hand this form to the staff, drop into the collection box, or mail to:  
Program Manager, Hardwood EIS  
Environmental Division  
Air National Guard Readiness Center/CEVP  
3500 Fitchet Avenue  
Andrews AFB, MD 20762-5157

005HW

Morris

Brockman

# Written Comment Form

SEP 18 1997

## DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Henry Bruse  
TITLE/ORGANIZATION: Conservation Chair - Aldo Leopold Audubon Society  
ADDRESS: 1820 Wickham Ave Wisconsin Rapids WI 54495  
(Street) (City/State/Zip)

### - COMMENTS -

For the Aldo Leopold Audubon Society:  
We believe that County government will be more  
interested in conservation programs, and more  
accountable for their success.

We are concerned about the effect an increased  
intensity of low level flights will have on  
wildlife on nearby land. We are particularly  
concerned about Sandhill Wildlife Area and  
the Wood County Wildlife Area. Several  
innovative conservation programs are in progress  
there.

Therefore we oppose expansion of the Hardwood  
Range.

I am grateful for your consideration of our  
thoughts.

Please hand this form to the staff, drop into the  
collection box, or mail to:

Program Manager, Hardwood EIS  
Environmental Division  
Air National Guard Readiness Center/CEVP  
3500 Fetcher Avenue  
Andrews AFB, MD 20762-5157

## RESPONSES TO COMMENTS

### Response to Comment No. 1

The best available information and scientific studies indicate that the effects of aircraft overflights on wildlife and livestock are generally short-term and minor, with no means to cause long-term effects such as reduced reproduction, increased mortality, or habitat abandonment. Noise impact studies from a variety of military use areas were considered in the impact analysis process. Refer to Subsection 4.8.1.3 of this EIS for further discussion of noise impacts to wildlife.

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## Written Comment Form

SEP 18 1997

### DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Steve Grant

TITLE/ORGANIZATION: \_\_\_\_\_

ADDRESS: 3810 7th St. S. Wisconsin Rapids, WI 54494  
(Street) (City/State/Zip)

#### - COMMENTS -

I oppose the expansion of Hardwood Range. As a resident in Wis. Rapids, and a sportsman, I take advantage of having the County Forest lands available to me. I utilize the land in the proposed expansion for hunting in the fall. I have found this land to be rich in diversity of both upland and wetland which makes it exceptional habitat for wildlife. The expansion area is close to Wis. Rapids which makes it very accessible for recreational use at any time of day or year. We do not need to convert this valuable land to a bombing range!

Environmental impacts have been grossly understated in the DEIS. If additional flight routes over land in Southern Wis. were dropped due to environmental impacts, how could the impacts possibly be acceptable for bombing forest and wetland areas? As it is, use of the existing range impacts the quality of recreational use of nearby areas, including this area.

I also concur with other opinions that the ANG should be looking elsewhere to expand its range. This is a federal action and there are tens of thousands of acres of Federal land closer to Volk Field where a range could be constructed. I ~~can~~ also feel the ~~mitigation~~ could work better with other branches of the military to better use existing facilities at Fort McCoy.

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 2

Proposals for additional MTR's from the south were dropped because of operational limitations unrelated to the dropping of practice ordnance at the range location.

### Response to Comment No. 3

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

Use of areas close to Volk Field, in particular the facilities at Fort McCoy, was addressed in Subsection 2.3.

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS  
Environmental Division  
Air National Guard Readiness Center/CEVP  
3500 Fitch Avenue  
Andrews AFB, MD 20762-5157

0071W

Steve

Grant

## Written Comment Form

SEP 18 1997

## RESPONSES TO COMMENTS

### DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: KURT GROSS

TITLE/ORGANIZATION: ALEXANDER FIELD AIRPORT - ADMINISTRATOR

ADDRESS: 211-12TH AV. S. WIS RAPIDS, WI 54494  
(Street) (City/State/Zip)

#### - COMMENTS -

THE SOUTH WOOD COUNTY/ALEXANDER FIELD AIRPORT  
COMMISSION IS OPPOSED TO THE EXPANSION  
OF THE HARDWOOD RANGE, EVEN AT ITS PRESENT  
SIDE, THE HARDWOOD RANGE & ITS ASSOCIATED  
AIRSPACE MAKE THE USE OF AND ACCESS TO  
ALEXANDER FIELD DIFFICULT & DANGEROUS. VFR TRAFFIC  
IS DISCOURAGED FROM FLYING IN THE MOA'S AND  
IFR TRAFFIC IS ROUTED AROUND MOA'S. IFR TRAFFIC  
MUST THEREFORE ENDURE DELAYS THAT COST TIME  
& MONEY. TO GET FROM WIS. RAPIDS TO LACROSSE INVOLVES  
FLYING NORTH TO WAUSAU - WEST TO FAU FAIRF AND  
THEN SOUTH TO LACROSSE. THIS DOUBLES THE  
LENGTH OF THE FLIGHT.

I, KURT GROSS, AS OWNER OF WINGS, AN  
AIRCRAFT CHARTER & FLIGHT INSTRUCTION BUSINESS  
OPPOSE THE EXPANSIONS FOR THE ABOVE REASONS.

Please hand this form to the staff, drop into the  
collection box, or mail to:  
Program Manager, Hardwood EIS  
Environmental Division  
Air National Guard Readiness Center/CEVR  
3500 Fetchet Avenue  
Andrews AFB, MD 20762-5157

#### Response to Comment No. 1

The ANG recommends that interested parties call Volk Field  
at (608) 427-1201 to resolve current operations problems involving Alexander  
Field Airport and military aircraft. Aircraft on a VFR flight plan are  
authorized to transit military operations areas (MOAs) at all times at the  
pilot's discretion. To help determine if a MOA is scheduled to be used during  
the desired transit time, pilots can call (800) 972-8673 or listen to an ANG-  
sponsored airspace information system recording broadcast on frequency  
120.0 MHz. The ANG initiated this recording as a service to pilots so they can  
plan their flights knowing the military's planned activities. The ANG wants  
aircraft to have unimpeded access to MOAs during periods of non use.

Floyd Hobenstein

SEP 18 1997

RESPONSES TO COMMENTS

Sept 18, 1997

To Whom it may Concern-

Re: Hardwood Range.

As a property owner in the proposed Hardwood Range <sup>with</sup> expansion, I have many reasons to oppose any expansion to the existing range.

I purchased this property in 1978, at which time I had plans for the future, which is now. And that was to be able to get away from the busyness of a city, and walk its many trails, enjoy the viewing and photographing wild life, such as deer, turkey, grouse, as well as my latest discovery of a Blandings turtle which I have many shots of it in the wild.

My family and I also use the property for berry picking and hunting of all types.

The near extirped Timber Wolf has been sighted, as well as several sightings of Black Bears.

These property that the Air National Guard plans to destroy involves a lot more than what meets ones eye.

Page 1 of 4

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

009HFW

Floyd

Hobenstein



Thayer H. Hester

## RESPONSES TO COMMENTS

I'm also concerned with all of the air guard accidents in the recent months. In fact 6 since last Saturday. These aircraft fly low over the city of Nebraska and the surrounding area which is becoming more and more populated. The risk of having a mishap is not lessening with the use of your high speed F-16. Why don't you people admit, your not perfect, and should reconsider the and proposal for a target range.

The noise is also a problem in and around the existing range. An now you want to increase the flights, and direction of aircraft ingress and egress. Why not go to an area (Government property) and develop a range that would handle all aircraft. By the time this proposed complex is built, it will be obsolete for newer and faster aircraft, just as the existing range is obsolete for the existing F-16. on what you want to do with it.

### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 3

Noise levels associated with operations that would be conducted if the proposed action were implemented are compared with current conditions in Table 4-1 of the EIS.

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' base.

Long Hiker

## RESPONSES TO COMMENTS

I believe its time in this upset world conditions that the military, Stagon and all of the famous leaders start to listen to the people that are involve in situation such as the Hardwood Range expansion. I have not talked to one single person that favors the removal of County Forest land from public use. This is a big item, and has a lot of people in our area very upset knowing that a large area of the Public Forest would be removed from public use. Regardless what the Air Guard say about hunting. They still keep the gates closed. Its real hard to put much faith in what they say. There message is what they want you to hear, but not what to be done.

The demand for food around the world, and now you want to take productive cranberry land off the market as well as future land for possible expansion.

The only area to gain by this move is Juniper County. Wood County is the big loser. So keep your range where it is.

Page 314

### Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

### Response to Comment No. 5

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

### Response to Comment No. 6

No lateral change will be made to existing R6904A.

### Response to Comment No. 7

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

The flight for life is a very important vehicle of emergency transportation of sick and accident victims. So with the air space control being limited to only certain areas and times of day. This in itself should be enough for the air guard to reconsider their proposal.

Commercial Air space is also restricted due to existing ranges, say nothing what will happen if the range is expanded as proposed.

I've nothing against the Air Guard or any military operations, but I do believe they should strive for peace, rather than killing our neighbors. Some time at the Golden Gate they all will have to account for their actions.

So in closing, I want it to be known that I'm very opposed to any type of range expansion into Wood County.

It's time for you to listen to the people.

Floyd A. Hohenstein.  
332 Wood Ave  
Nebraska, WI.  
54457.

Active Core Member.

Page 7 of 7

000100

Floyd

Hohenstein

WAYNE KING

SEP 18 1997

## Some Thoughts for Hardwood Expansion

### RESPONSES TO COMMENTS

ON this day - the 50<sup>th</sup> Anniversary of the U.S. Air Force we should look back to how ill prepared and untrained our boys were, going into WWII. We all vowed never to let it happen again. The air force did its part the 50 years by its high level of training which has been the difference in all the wars & skirmishes since. Apparently many have <sup>now</sup> forgot the "thank you" its our boys up there <sup>who</sup> when they see planes over head.

For those who agree we must have training they must agree that the training will be in some ones back yard. There's always someone who will have a land fill, a highway, a power plant etc near by. It's simply the price we pay for those things on which we depend.

Having the training facility near by, will save many hours of flight time and allow our boys to train and maintain readiness at less cost - especially since the air force is depending on reserve forces as the defense budget is cut.

#### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

#### Response to Comment No. 2

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

510HW

Wayne

King

I thought having the range where  
it is was a good idea in the  
1940's and I think it still a  
good idea in the 1990's. Our  
National Guard pilots want  
from using the Hardwood Range to the  
Korean sky - where they distinguished  
themselves. The training at Hardwood  
probably helped. Do we want anything  
less for our greatest airman? The  
day will surely come when all <sup>the</sup> citizens  
will say "I hope it our boys up  
there."

Sincerely

Wayne D. King  
Rudolph, W.V.

366 ELM RD 54473

## Written Comment Form

SEP 18 1997

### DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: John W. Schaller MD

TITLE/ORGANIZATION: retired MD

ADDRESS: 5018 N. Byron Dr Wic Ridge WI 54494  
(Street) (City/State/Zip)

- COMMENTS -

Strongly favor enlarging Hardwood Range -  
Recent program appears reasonable and has  
been a driving point for many of us  
interested in Air Nat Guard and general.

Please hand this form to the staff, drop into the  
collection box, or mail to:

Program Manager, Hardwood EIS  
Environmental Division  
Air National Guard Readiness Center/CEVP  
3500 Fitchet Avenue  
Andrews AFB, MD 20762-5157

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

# Written Comment Form

SEP 18 1997

## DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Tom Weiler

TITLE/ORGANIZATION: land owner

ADDRESS: 3599 Seneca Rd Vir Rapids Vi 5-4495  
(Street) (City/State/Zip)

### -- COMMENTS --

The county forest land is too valuable to the people of wood county to be used for a bombing dump. The land value for sports is irreplaceable. The land is all potential cranberry growing areas. To lose the land is too much of an economic issue to the people of wood Co. We are the future generations this resource.

1

## RESPONSES TO COMMENTS

### Response to Comment No. 1

Impacts to recreation and cranberry growing are discussed in the Socioeconomics Subsection 4.12 and the Land Use Subsection 4.10.

237

Please hand this form to the staff, drop into the collection box or mail to:  
Program Manager, Hardwood EIS  
The Environmental Division  
Air National Guard Readiness Center/CEV  
Box 3500, Fitch Avenue  
Andrews AFB, MD 20782-5157

012HW

Tam

Weiler

.



## **PUBLIC COMMENTS RECEIVED BY MAIL**

---

---

**FEDERAL, STATE, AND LOCAL  
GOVERNMENT AGENCIES**

### Written Comment Form

SEP 30 1997

**DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE  
HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS**

If you would prefer to submit written comments on the DEIS, please use this form. Continue on the back of the form or attach extra sheets, as necessary. Thank you.

NAME: Richard Daniels  
TITLE/ORGANIZATION: Mayor, City of Marshfield  
ADDRESS: PO Box 727 Marshfield, WI 54449  
(Street) (City/State/Zip)

-- COMMENTS --

Please see attached resolution

$$\left. \begin{array}{l} \text{---} \\ \text{---} \end{array} \right\} 1$$

## RESPONSES TO COMMENTS

### **Response to Comment No.1**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

239

Please hand this form to the staff, drop into the collection box, or mail to:

Program Manager, Hardwood EIS  
Environmental Division  
Air National Guard Readiness Center/CEP-  
3500 Fitchet Avenue  
Andrews AFB, MD 20762-6157

RESOLUTION NO. 95-36

A resolution expressing the position of the City of Marshfield Common Council concerning the proposed expansion of the Hardwood Air-to-Ground Training Range and the related expansion of military training routes.

WHEREAS, the City of Marshfield owns and operates a municipal airport in Marshfield, Wisconsin; and

WHEREAS, in 1994, the airport logged a total of 6,076 reported operations, of which 3,220 were single engine aircraft; 2,590 were multi-engine aircraft; 160 were jet prop aircraft; 52 were jet aircraft; and 54 were helicopters; and

WHEREAS, the importance of the Marshfield Municipal Airport has been recognized over many years as evidenced by the significant investment of funds by the City, State of Wisconsin Bureau of Aeronautics, and the United States Department of Transportation; and

WHEREAS, the continued viability of the Marshfield Municipal Airport is vital to the future economic growth of the Marshfield area; and

WHEREAS, the proposed expansion of the Hardwood Range and related military training routes 1) would have a negative impact on general aviation and air commerce at the Marshfield Municipal Airport; 2) would negatively impact the number and timeliness of departures and arrivals at the airport; 3) would impact the use of the S.D.F. approach to the airport's runway 3/4; and 4) would negatively impact the safety and utility of the Spirit of Marshfield helicopter ambulance based at St. Joseph's Hospital in Marshfield.

NOW, THEREFORE, BE IT RESOLVED by the Common Council of the City of Marshfield that the City of Marshfield is opposed to the proposed expansion of the Hardwood Air-to-Ground Training Range and the related expansion of military training routes and urges the Air National Guard and Air Force to pursue other alternatives which are consistent with both the nation's defense strategy and regional economic considerations; and

BE IT FURTHER RESOLVED that a copy of this resolution be forwarded to United States Senators Herb Kohl and Russell Feingold; United States Representatives David Obey, Steve Gunderson, and Thomas Petri; Major Kent Adams, United States Air Force; Governor Tommy G. Thompson; State Senator Kevin Shibilski; and State Representative Donald Hasenohrl.

DATED THIS 13<sup>th</sup> DAY OF SEPTEMBER, 1995.

ADOPTED: September 12, 1995 Richard E. Daniels

Richard E. Daniels, Mayor

APPROVED: September 12, 1995 Carolyn A. Kautzer

Carolyn A. Kautzer, City Clerk

## RESPONSES TO COMMENTS



State Historical Society of Wisconsin

816 State Street • Madison, Wisconsin 53706-1488 • 608/264-6400 • Fax: 264-6504

Division of Historic Preservation  
608/264-6500

October 13, 1997

Mr. Harry Knudsen  
Air National Guard  
Environmental Division  
ANG/CEVP  
3500 Fetchet Avenue  
Andrews AFB, MD 20762-5157

SHSW#: 92-0087/JU/WO  
RE: Expansion of Hardwood Range & Related  
Airspace Actions

Dear Mr. Knudsen,

We have reviewed the "Draft Environmental Impact Statement Addressing the Hardwood Expansion and Associated Airspace Actions". The Draft EIS did not adequately address the effects that the proposed undertaking may have on Historic Properties.

In our letter of February 10, 1995, we recommended that an archeological survey and an architecture/historic survey be completed for the proposed undertaking. In our letter of July 6, 1995 to Ms. Lorraine Gross, we recommended that a Traditional Cultural Property survey be completed for the area of potential effect of the proposed undertaking. We did not receive a response to any of the letters we have written regarding this undertaking. To date, to my knowledge, neither an archeological survey, an architectural survey, nor a Traditional Cultural Properties survey has been completed to identify any historic properties that may be in the area of potential effect of this undertaking.

Pursuant to 36 CFR 800.4(b): "In consultation with the State Historic Preservation Officer, the Agency Official shall make a reasonable and good faith effort to identify historic properties that may be affected by the undertaking and gather sufficient information to evaluate the eligibility of these properties for the National Register." It is our understanding, as a matter of policy, that the Air National Guard should have conducted an archeological

### Response to Comment No. 1

The ANG is not aware of the existence of any traditional cultural resources within the proposed expansion area. The ANG has not completed a cultural resources survey for the expansion property. Several cultural resources lie underneath existing airspace associated with Volk Field not included in the proposed action. As additional resources are made available to the ANG, appropriate analysis will be determined and accomplished.

Guidelines for the preparation of EISs do not require that a complete cultural resource inventory be performed within an area of potential effect. Such guidelines require that a Federal agency proposing an undertaking, in this case the ANG, collect enough information on cultural resources, including Native American values, to make a decision regarding the proposed action and alternatives. The background research conducted for the EIS provides sufficient information to allow the decision maker to weigh the potential impacts to both identified and unidentified cultural resources that would be affected by the alternatives. Such guidelines also allow nondestructive planning prior to an undertaking, as well as phased compliance at different stages of planning. As stated in Subsection 4.9.1.2, The Section 106 Process, cultural resource survey of lands potentially affected by ground disturbance would be completed when an alternative is selected. Identified resources would be evaluated according to National Register criteria, and adverse effects to significant cultural resources (i.e. those that are eligible for the National Register) would be avoided or mitigated. Appropriate levels of mitigation would be determined through consultation among the ANG, the Wisconsin SHPO, the Ho-Chunk Nation, and the ACHP.

00216

Sherman

Banker

survey, historical survey, and the Traditional Cultural Properties survey prior to releasing the Draft EIS for comments.

We would be happy to meet with you or members of your staff to develop an appropriate scope of work to identify any historic properties that may be located within the area of potential effect of this undertaking and ensure that the Section 106 review process is completed.

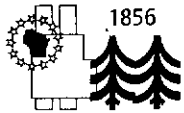
If you have any questions concerning these matters, please call me at (608) 264-6507.

Sincerely,

*Sherman Banker*

Sherman Banker  
Compliance Archeologist

cc: Druscilla Null, ACHP



# Wood County WISCONSIN

COUNTY BOARD  
CHAIRMAN'S OFFICE

## RESPONSES TO COMMENTS

October 21, 1997

Air National Guard Readiness Center  
Program Manager, Hardwood Range EIS  
ANGRC/CEVP  
3500 Fetchet Avenue  
Andrews Air Force Base, MD 20762-5157

The Wood County Board has shown strong opposition to the expansion of the Hardwood Bombing Range into Wood County in the form of a unanimous resolution dated February 21, 1995, and by the attached resolution passed on October 21, 1997. Over time, it has become increasingly apparent there are no benefits for Wood County should the range be expanded as proposed. There are, however, numerous significant negative ramifications, some of which are outlined in this cover letter. Others are detailed in the commentary section that follows.

Should the proposed expansion take place, Wood County and the State as a whole will lose over 6,000 irreplaceable acres of county forest. These lands are used for recreation, wildlife habitat, wetland preservation and timber production. It is noteworthy that the State of Wisconsin has just purchased Willow Flowage, for the same type reasons, at a cost of millions of dollars. It seems reasonable then that Wood County should expect state support for the retention of its county forest. It should further be noted that attempts by Wood County to identify replacement lands, in the event the proposed expansion were to take place, have been met with resolute and angry opposition. This is primarily a township tax issue in addition to opposition to the sale of the existing forest.

The Draft Environmental Impact Statement discusses a \$42,000 annual loss to Wood County and its municipalities and \$25,000,000 in benefits to the area of influence (AOI), i.e. Wood, Juneau, Monroe and Adams Counties. This description is indicative of the document's shortsighted review. The major portion of the \$25,000,000 annual amount accrues to Juneau County, and a minuscule amount to Wood County. The \$42,000 annual loss in timber sales and road aids does not begin to recognize the detrimental financial impact of this expansion on Wood County. Every Wood County taxpayer stands to suffer economically from any activity that erodes our ability to attract new/or retain and expand existing industry. The importance of transportation

### Response to Comment No. 1

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

### Response to Comment No. 2

The discussion of potential socioeconomic impacts now includes updated information on local public revenues and timber harvesting, an estimate of manufacturing activities related to timber harvesting in the expansion area, and more discussion of tourism. Updates are contained in Socioeconomics Subsections 3.12 and 4.12 with more detailed socioeconomic data contained in Appendix 1. Specific impacts on business retention and future economic growth outside of the range, though possible, can not readily be quantified beyond the above types of estimates, given the numerous and complex factors that affect such business decisions and economic activities.

003LG      Gordon      Stueggdt



## RESPONSES TO COMMENTS

Air National Guard Readiness Center  
October 21, 1997  
Page 2

is of paramount importance to attracting industry. Marshfield and Wisconsin Rapids are the only cities of their size in the state without direct access to 4-lane highways. Our regional airport is located in Marathon County and has only turboprop carriers to serve a multi-county area. Local business executives are already complaining about travel limitations around the existing military operation area (MOA). What will happen when this MOA is expanded? The residents of Wood County, through local and state representatives, have aggressively sought improved transportation access. We will not stand passively by now while others attempt to use Wood County resources for outside county economic gain.

It is interesting to note that there have been veiled insinuations made of the importance and possible lack of patriotic spirit/duty on the part of Wood County citizenry. There has been a simultaneous, ongoing debate and conflict of theories about modern day warfare and questions of technology as it relates to the need for low level bombing and strafing. There have also been at least six recent incidents of air force plane crashes associated with training missions, which seems to accentuate the need for such training to be performed in unpopulated areas. It does seem fitting, since the project is being presented as important to the nation as a whole, that we not use only one county's resources (Wood) for the obvious benefit of another (Juneau) if not the proposed good of the entire nation.

The Wood County Board of Supervisors proposes then, that should there persist an ongoing interest in the need for an expanded range, the existing bombing range and proposed expansion be moved west of Highway 80 to federal lands located in Juneau County. In a sense, this enables the entire nation to contribute to this endeavor through the use of federal lands. Furthermore, it seems appropriate that this land be located in the county that has the most to gain economically.

In regard to the Draft Environmental Impact Statement, the document is totally inadequate. The format used is cumbersome to digest. Its size is not indicative of its thoroughness nor the quality of its content. Information is substituted from locations outside the expansion area and very little information is given in regard to the state of environment of the existing range; information necessary if conclusions regarding use impact are to be properly studied. The concept that we be limited to five options in regard to the Hardwood Bombing Range is presumptuous. In the limited time allowed, however, we have attempted to comply with your request for comments on the following pages.

Again, we respectfully ask that you consider our proposal to relocate the bombing range to federally owned property in Juneau County.

### Response to Comment No. 3

This proposal will not expand the lateral boundaries of any of the military operations areas (MOAs) that Volk Field personnel currently schedule and manage. Therefore, this proposal should not adversely affect travel for local business executives. The ANG recommends that interested parties call Volk Field at (608) 427-1201 to resolve current operations problems involving local and military aircraft. Aircraft on a VFR flight plan are authorized to transit MOAs at all times at the pilot's discretion. To help determine if the MOA is scheduled to be used during the desired transit time, pilots can call (800) 972-8673 or listen to an ANG-sponsored airspace information system recording broadcast on frequency 120.0 MHz. The ANG initiated this recording as a service to pilots so they can plan their flights knowing the military's planned activities. The aircraft have unimpeded access to MOAs during periods of non use.

### Response to Comment No. 4

The use of other training areas was examined as part of the development of the alternatives studies in the EIS and is given in Subsection 2.3.2. The proposal was designed to minimize conflicts with potentially sensitive areas while providing the training resources necessary to meet military readiness requirements. Because of limited fiscal resources and aeronautical constraints, virtually all of our nation's fighter units train in airspace that is within a "tank of gas" of the aircrews' home station.

### Response to Comment No. 5

The research completed to support the preparation of the Hardwood Range EIS follows the use of various accepted scientific methodologies used to analyze pertinent potential impacts. These analyses have been prepared by qualified scientists and engineers who perform these services for a variety of customers, including the ANG. Copies of all material used in the preparation of the EIS is available on reserve at the Mauston, WI public library.

### Response to Comment No. 6

The Council on Environmental Quality provides guidelines for the preparation of Environmental Impact Statements, and the review of EISs by the public and various government agencies. These guidelines direct agencies to "allow not less than 45 days for comments on draft statements" (Section 1506.10 of these guidelines). The comment period for the Hardwood Draft EIS officially opened August 22, 1997 with the Notice of Availability published in the Federal Register. The initial mailing of the statement to over 600 addressees was accomplished by August 21, 1997, prior to the NOA. The close of the comment period was published as November 21, 1997 (91 days).

**RESPONSES TO COMMENTS**

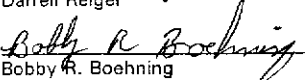
Air National Guard Readiness Center  
October 21, 1997  
Page 3


Sincerely,

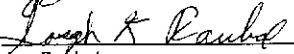
**VOLK FIELD COMMITTEE**

  
David Draves, Chairman


  
Darrell Reigel

  
Bobby R. Boehning

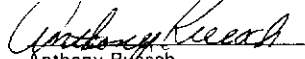
  
Cliff Bowden

  
Joe Raubal

**WOOD COUNTY BOARD OF  
SUPERVISORS**

  
Gordon Stargardt, Chairman

**WOOD COUNTY CLERK**

  
Anthony Ruesch

**Response to Comment No. 7**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Enclosures

## RESPONSES TO COMMENTS

# DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS

Comments on the draft environmental impact statement (EIS) have been divided into two parts: the draft EIS itself and the Socioeconomic study.

# DRAFT ENVIRONMENTAL IMPACT STATEMENT

**ALTERNATIVES** - Alternatives listed in the draft EIS are not complete. Most are eliminated with little explanation. An inherent function of the EIS is to study alternatives to the proposed action. At a minimum the following alternatives need to be fully explored before continuing any further with the proposed action:

Relocate the bombing range onto federally owned property in Juneau County. The federal government currently owns approximately 100,000 acres in Juneau County. The properties are well blocked with few inclusion of private property. These properties have been extensively surveyed for rare and endangered species and communities and are referenced in the draft EIS on several occasions. Portions of these properties are currently managed as prairies and barrens which are similar in appearance to the impact area. It seems logical the expansion/relocation would less likely have adverse effects on the environment if it were on these properties rather than on the Wood County Forest where very minimal survey work has been completed. In addition to environmental savings, it would also be cheaper to relocate the buildings, targets and tower complex to this area than it would be to spend several millions of dollars purchasing property in Wood County and still have to construct facilities adjacent to the new impact area. In regard to timing concerns, it would seem logical that relocation to property already owned by the federal government would be more expedient than purchasing and condemning property in Wood County.

Expand immediately south of the existing range. This alternative does not appear to have been considered. The economic advantages of the range lie within Juneau County. There is a logic that the area of benefit would be the area of cost. It would be appropriate that the expansion and associated costs remain in Juneau County.

Expand east of the existing range. This would allow aircraft to approach

### Response to Comment No. 8

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 9

The Air National Guard has no jurisdiction to acquire lands presently under the administration of another Federal agency. Lands such as the Necedah National Wildlife Refuge already have a specific mission in their own right and therefore represent an extremely undesirable alternative to fulfill the need express by the Proposed Action.

### Response to Comment No. 10

See response to comment above.

## RESPONSES TO COMMENTS

from the east in addition to the existing approach, thereby increasing the training advantage over the existing range. This could also be completed with less land purchase.

11

**NOISE** - It is our understanding that the models used in studying noise impacts used individual aircraft on designated routes.

12

What noise impact would multiple aircraft in close proximity to each other create?

13

Was strafing and bombing included in the noise modeling of the various aircraft and in combination with other aircraft?

14

The information provided on the effects of noise on wildlife was conflicting. Further study is necessary to determine the effect of low military flights and bombing and strafing on wildlife.

15

Recreational users, especially hunters, would be affected by aircraft noise in areas that currently do not experience this noise. Deer and turkey hunters would be handicapped by additional noise.

16

### AIRSPACE/AIRCRAFT

**SORTIE TOTALS** - Current and proposed numbers of sorties are shown in the draft EIS. It is unclear what is currently permitted in each MA and what is actual being flown. Also, it is important to show trends. What are the annual figures for each of the last ten years? More importantly, what assurance is there that the Air National Guard won't be seeking additional expansion in order to promote increased activity in future years?

17

**FLIGHT RESTRICTIONS** - Under section 2.4 (and elsewhere), "Summary of Special Operating Procedures and Flying Restriction", the document insinuates special restrictions have been employed by the Air National Guard to insure sensitive areas are not disturbed by military aircraft. At least two of those restrictions listed are required by FAA regulations for all aircraft including military aircraft. These should be removed or explained in the correct manner.

18

### ENVIRONMENT

**WETLANDS** - The plan is vague regarding wetlands. What wetlands are on the proposed expansion area by type and acreage? What wetlands are in the

19

#### Response to Comment No. 11

All initiatives to expand low-altitude airspace to the east of Hardwood Range have been rejected by the Federal Aviation Administration based on conflicts with civilian aviation.

#### Response to Comment No. 12

The cumulative noise levels reflected in the EIS account for all aircraft using the airspace. Also, the calculations performed by the noise model (MR\_NMAP) account for multiple aircraft passing over the same location since the cumulative noise levels represent the sum of all noise exposures experienced at each specific location. The maximum A-weighted sound levels that have been added to the EIS text do represent the maximum sound level experienced regardless of the number of aircraft that may be in a formation. This is because the maximum sound level is only experienced when the aircraft is closest to the receptor, and only one aircraft at a time can be in that precise location.

#### Response to Comment No. 13

See response to comment above.

#### Response to Comment No. 14

Noise modeling included all aircraft using the range, performing all anticipated maneuvers. Therefore, defined strafing and bombing tracks were identified and described whenever possible, and applicable numbers of aircraft were assigned to those tracks. However, noise modeling is limited to aircraft noise (i.e., noise from the engine and aerodynamic noise associated with the aircraft's passage through the air). There are no approved models to assess the noise resulting from the airborne firing of 20 mm and 30mm ammunition. In regard to training ordnance, the gunpowder used in the spotting charges is approximately equivalent to that contained in two 12 gauge shotgun shells. Since the charge is contained in the housing of the training ordnance, any noise resulting from its detonation is considered insignificant.

248

## RESPONSES TO COMMENTS

### **Response to Comment No. 15**

Subsection 4.8.1 of this EIS discusses noise impacts to wildlife. There is evidence in the scientific literature that startle or panic responses to noise do occur in some wildlife species. However, existing studies suggest that these short-term responses do not result in long-term population impacts. A study conducted in North Carolina concluded that "the low response rate of waterfowl behaviors to the presence of aircraft in this study suggested that waterfowl either did not perceive the aircraft as a stressor, or that they became habituated to the presence of aircraft due to repeated exposures over time" (Fleming et al. 1996). Also, the same study found that nesting rates, nesting success, the number of eggs laid, the number of eggs hatched, and nest desertion rates were the same in areas with aircraft overflights and areas without aircraft overflights. However, the study did find that duckling exposed to airport-related aircraft noise grew slower and weighed 4.6 percent less than ducklings not exposed to noise. The existing noise levels and any changes in noise should the proposal be implemented, do not result in the levels of noise related to airport activity. As reported in the study conducted by Ellis et al. 1991, low-level overflights and mid- to high-altitude sonic booms did not have long-term adverse impacts to nesting raptors (refer to Subsection 4.8.1.3).

For species that may not reuse nesting sites or have multiple roosting or nesting sites, avoidance of known bird concentration areas may not be feasible. However, as discussed above and in Subsection 4.8.1.3 of the EIS, intermittent overflights of bird nesting or roosting areas are unlikely to result in long-term adverse impacts to raptors, waterfowl, or other birds.

### **Response to Comment No. 16**

The proposed changes to airspace involve changes in altitudes only. Military airspace expansion is not proposed over lands that do not currently experience military aircraft overflights.

### **Response to Comment No. 17**

Historic usage of each airspace component was presented in Table 2-6 of the Draft EIS. The Air National Guard has no plan to seek additional expansion of airspace to promote increased sorties in future years.

## RESPONSES TO COMMENTS

### **Response to Comment No. 18**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### **Response to Comment No. 19**

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

## RESPONSES TO COMMENTS

### Response to Comment No. 20

The proposed expansion area was surveyed for threatened, endangered, and sensitive species in 1996. Please refer to Appendix L of the EIS, Biological Survey of Hardwood Range, for further discussion of these surveys. Coordination with the USFWS is ongoing and will continue, as appropriate, prior to implementation of the proposal, as required by Section 7 of the Endangered Species Act.

### Response to Comment No. 21

Studies conducted on wildlife have shown that numerous wildlife species have the ability to adapt to the presence of man and various man-made sound sources, including jet aircraft noise. While the noise generated from low-altitude military overflights may be initially startling, habituation to jet aircraft noise occurs with most wildlife species. Species-specific responses to low-altitude overflights vary considerably, and responses from individual animals may have the potential to cause injury. However, wildlife populations are usually affected only when a variety of factors work in combination to impact them, including declines or fluctuations in the availability of a food source, habitat destruction or alteration, predation, hunting, trapping, poaching, disease, or inclement weather, rather than noise alone. Normally it would be unrealistic to predict or attribute any wildlife population declines to a single stressor, such as noise. In addition, no published scientific evidence was identified that indicated harm may occur to wildlife as a result of exposure to the levels of noise generated by military aircraft that would utilize the airspace associated with the Hardwood Range.

### Response to Comment No. 22

Although operational and safety parameters will affect recreational and forestry access to the land in the potential expansion area, recreational uses, including hunting, would continue as they have at the current range area. Logging operations are compatible with range operations through coordination with Volk Field staff responsible for range operations.

### Response to Comment No. 23

The ANG firmly commits to not impact wetlands in development of the proposed expansion area. Best management practices would be employed to control soil erosion (i.e., vegetated buffer zones along streams and other sensitive features, use of silt fencing around construction sites, etc.) during construction of the tactical target complex, roads, landing zone, and drop zone, so erosion should be minimal. Much of the Hardwood Range, proposed expansion area, and surrounding areas are comprised of similar wetlands that would continue to function unimpeded at the regional level.

proposed drop zone, landing strip, and impact areas, and what is their fate? If they are to be filled, how and where will the loss be mitigated?

ENDANGERED RESOURCES - The proposed range expansion area has not been inventoried for threatened, endangered, or rare species or communities. This needs to be completed before environmental effects can be determined. It is important to survey during appropriate times which are dependent on the particular species being surveyed (e.g. Karner blue butterflies during their second flight). Habitat Conservation Plans (required by federal law) should be made part of this document for endangered species identified or likely to occur in the expansion area.

Noise - As previously mentioned, the information provided on the effects of noise on wildlife was conflicting. Further study is necessary to determine the effect of low level military flights and bombing and strafing on wildlife.

## LAND USE

The following statement is included on page 2-32, "Recreational and forestry uses of the land proposed for inclusion in the range expansion and of the lands underneath the proposed expanded R-6904B airspace would continue to occur within operational and safety parameter; therefore, adverse impacts on land uses of this area are not expected to occur." We completely disagree. This would have adverse impact on both recreation and forestry.

The plan is ambiguous about the impact area. What are the specifics for this area?

## SOCIOECONOMIC STUDY

The draft EIS states that Volk Field contributes over \$25,000,000.00 annually to the regional economy through payrolls, construction, expenditures, purchases of supplies and services, deployed personnel spending, and related secondary expenditures. The spending at Volk Field is not relevant to the expansion of the range or the airspace issues and should not be included in this document. There has been no discussion regarding the status of Volk Field changing whether or not the expansion occurs. In fact, the draft EIS has said the existing range would not be closed if the expansion does not occur. The Discussion of Volk Field's financing only serves to trivialize losses to other municipalities.

Of the \$25,000,000.00 benefits, from Volk Field, \$10,000,000 is described as

**RESPONSES TO COMMENTS****Response to Comment No. 24**

Information on Volk Field has been provided as part of the description of existing conditions for Juneau County, along with other information on employment and economic activity in the county where the existing range is located. Although operation of the expanded range would minimally effect Volk Field economic activity after initial construction activities, this information has been included as baseline information .

**Response to Comment No. 25**

Wisconsin DNR has provided multiplier factors that have been used to estimate secondary effects. This data has been incorporated into Subsection 4.12.2.3 of the EIS (Employment and Local Economy) and into Subsection 4.1.3 of Appendix I (Socioeconomic Study for the Hardwood Range Expansion) in Volume I.



## RESPONSES TO COMMENTS

secondary effects. Why are there no secondary values added to the costs/losses to the County and other municipalities? Only timber sale stumpage figures, state aid, and taxes were calculated. Costs of cutting, skidding, hauling, price at the mill, turn over of money within the community, etc. were not used. Some of these figures may be received from local mills, The Pulp & Paper Association, US Forest Service, and the Wisconsin DNR Bureau of Forestry.

The Socioeconomic study does not discuss how noise from aircraft and airspace restrictions effect the quality of life within the region of influence. The relevance should be obvious as a good quality of life determines, in part, a communities ability to attract new economic development. Industry is less likely to relocate to new areas where transportation is limited and noise is an issue.

Timber sale revenues listed in the study are out of date. Revenues for 1995 were \$150,484.72. In 1996 the revenues were \$114,596.00. New averages need to be calculated using these figures. The report should also examine the trend in timber sale revenues over this time frame. Revenues have been increasing dramatically indicating forest revenues will become more significant.

The figures for cranberry acreage and revenues within the expansion area and the county are out of date. Updated figures may be received from the Wisconsin Cranberry Growers Association.

Section 3.2.3 states that "It is estimated that close to 30% of all jobs in the region are either directly or indirectly related to forestry and timber production." This is a very important statement. This proposal would remove approximately 16% of the county forest. This needs to be emphasized in the executive summary for the EIS.

Add trapping to displaced recreational activities.

Per this study, the Wood County State Wildlife Area had 36,000 hunting & trapping participant days plus 5,500 other recreation days. This type of data is not available for the Wood County Forest. As part of the study a survey needs to be completed determining use within the expansion area. Studies from the University of Wisconsin, the Fish and Wildlife Service, and Wisconsin Department of Natural Resources are available for determining socioeconomic effects of hunting, fishing and wildlife watching using such information.

The study does not clearly identify the effects of this action on state aid formulas to the local municipalities. What are the effects?

The county forest debt has for the time been retired. The report shows the debt at \$90,000.00.

### **Response to Comment No. 26**

Noise effects are discussed in Subsection 4.2.3 of the EIS and also in Subsection 4.10 under land use. Although some noise increases would occur as a result of range expansion, no significant noise effects are identified.

### **Response to Comment No. 27**

Timber sales data have been updated using the data provided.

### **Response to Comment No. 28**

Updated figures for cranberry acreage in the expansion area and county have been added.

### **Response to Comment No. 29**

Potential reductions in wages and earnings from economic activities related to timber harvesting has been added to the Executive Summary for Appendix I.

### **Response to Comment No. 30**

Trapping has been added to the description of recreational activities.

### **Response to Comment No. 31**

The potential reduction and displacement of recreational activities is not considered to be significant. A recreation survey would be a type of mitigation action. Under NEPA, only significant impacts require consideration of mitigations.

### **Response to Comment No. 32**

The Socioeconomic Study, given in Appendix I, addresses specific categories of intergovernmental aid that local, County, and State officials have identified, which could be affected by the range expansion.

### **Response to Comment No. 33**

The updated information on county forest debt retirement has been considered.

## RESPONSES TO COMMENTS

### Response to Comment No. 34

The discussion has been expanded to indicate that the amount of time or money committed by the County to the Wood County Forest, as a whole, is expected to remain approximately the same on an annual basis regardless of the possible change in its total acreage due to this proposal.

### Response to Comment No. 35

Town payments from timber sale revenues have been updated.

### Response to Comment No. 36

County forest road aid has been recalculated using the updated aid amount.

### Response to Comment No. 37

Land acquisition through condemnation would have similar socioeconomic effects to the acquisition of land through voluntary purchase and sale. Both would be based on the appraised value of the property and in both cases, relocation costs would be paid by the Federal government, private lands would be taken off the tax rolls once they are owned by the Federal Government, and the operation and potential socioeconomic effects of the expanded range would be similar.

### Response to Comment No. 38

Updated timber volume figures have been incorporated.

### Response to Comment No. 39

Land owners have different reasons for leasing their property. They may prefer an income stream rather than payment for a buyout. These reasons would not have a bearing on the study results and should not eliminate Option 2 from consideration as a potential acquisition method.

### Response to Comment No. 40

The discussion of factors affecting timber value in the expanded range has been expanded.

### Response to Comment No. 41

The analysis that has been provided discusses potential types of socioeconomic effects from acquisition of replacement lands. Considering the fact that the current ownership status and location of such replacement lands is not known, estimates of these effects have not been made.

The study states that revenue losses due to loss of county forest would be partly offset by decreases in county expenditures. There would be very little expenditure reductions. The county forest is only staffed by one employee. The largest expense is for salary and associated costs. These costs will not decline if the range is expanded.

The town severance payment should be calculated using the new timber sale revenues.

County forest road aids are shown as being \$200.00 per mile. The current rate is \$300.00 per mile.

Option 1 of the study is to purchase the property within the expansion area from the land owners. The county has stated that it is not a willing seller. Condemnation would be required. What are the socioeconomic effects of condemnation?

The timber volume figures used in the study are outdated. Use the updated figures as per the attached spread sheet.

Option 2 of this study is to lease the expansion area from the existing land owners. What advantage is there for a private land owner to own land being used as a bombing range. This option does not appear realistic.

The study indicates that the county's loss would be less if the county retained the timber rights. The timber rights have limited value. Timber rights are limited primarily due to access limitation (time & physical). Damage to timber due to shrapnel, loss of acreage due to clearing, a short window to harvest due to the bombing range schedule, and the loss of roads all erode the value of the timber rights. In addition, if the property is withdrawn from the county forest the DNR may not provide technical assistance in establishing timber sales.

The fiscal effects included in the study do not include the indirect effects of the county replacing county forest land. Assuming this to be a viable option, the study needs to determine the indirect effects and how substantial they will be. This may be accomplished by selecting two or three townships and completing a hypothetical purchase. This would give the reader and the decision makers an idea of what effects would result even if replacement was not completed exactly as studied.

## CONCLUSION

It is apparent the proposed expansion of the Hardwood Bombing Range into Wood County has been considered the path of least resistance because it involves only one

## RESPONSES TO COMMENTS

county and six private land owners. With all due respect, we consider the Draft Environmental Impact Statement an embarrassment to the Air National Guard. It is an abhorrent waste of taxpayers' dollars. It is insulting to contemplate the continuing decisions of the magnitude of the one before us being based on a document of such substandard quality. If this document is the best that could be prepared considering the time allowed for preparation, then surely the wisdom of this entire project must be considered suspect.

If it is determined that additional lands are needed to enhance the training currently taking place at the Hardwood Range, we request, as indicated in our cover letter, that the entire project be moved to federal lands in Juneau County, closer to existing military facilities (Volk Field in Juneau and/or Fort McCoy in Monroe) or to some other existing facility currently being considered for closure. This would seem to be a much better appropriation of tax payer dollars.

42

### Response to Comment No. 42

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

205

**HARDWOOD BOMBING RANGE  
PROPOSED EXPANSION AREA  
WOOD COUNTY FOREST PROPERTY**

**MERCHANTABLE TIMBER**

SPECIE	<u>ASPEN</u>	<u>OAK</u>	<u>R. PINE</u>	<u>J. PINE</u>	<u>W. PINE</u>	<u>HDWD.</u>	<u>TOTAL</u>
ACRES	2006	1052	504	197	79		3838 acres
CORDS	16,819	10,170	11,531*		1627	4820	44,967 cords
\$/CORD	\$18.25	\$9.01	\$37.31		\$31.11	\$13.84	
TOTAL \$	<u>\$306,947</u>	<u>\$91,632</u>	<u>\$430,222</u>		<u>\$50,616</u>	<u>\$66,709</u>	<u>\$946,126</u>
MBF**		527.75	2,273.29		50.75		2851.79
							MBF
\$/MBF		\$90.00	\$90.00		\$90.00		
TOTAL \$		<u>\$47,497</u>	<u>\$204,596</u>		<u>\$4,568</u>		<u>\$256,661</u>
GRAND							
TOTAL	<u>\$306,947</u>	<u>\$139,129</u>	<u>\$634,818</u>		<u>\$55,184</u>	<u>\$66,709</u>	<u>\$1,202,787</u>

**NON-MERCHANTABLE TIMBER**

SPECIE	<u>ASPEN</u>	<u>OAK</u>	<u>R. PINE</u>	<u>J. PINE</u>	<u>W. PINE</u>	<u>HDWD.</u>	<u>TOTAL</u>
ACRES	1107	203	126	71	43	53	1603 acres

**NON-FORESTED**

Lowlands (includes lowland brush, grass marshes, etc.)	696 acres
Uplands (includes upland brush and upland grass)	<u>83 acres</u>
TOTAL ACRES	779 acres

Total land area from recon data within proposed range expansion area is 6220 acres

\* Includes red and jack pine  
\*\* MBF = 1000 board feet

## WOOD COUNTY

RESOLUTION# 97-16-3ITEM# 4-2DATE October 21, 1997

EFFECTIVE: October 21, 1997

Page 1 of 2

Introduced by Volk Field Committee

Committee

## INTENT &amp; SYNOPSIS:

To go on record to express Wood County's concerns over the inadequacies of the Draft Environmental Impact Statement for the proposed Hardwood Bombing Range expansion and to affirm Wood County's continued opposition to the expansion of the range into Wood County.

Motion: Draves Adopted: Yes  
 1st: Josephson Lost: No  
 2nd: Josephson Tabled: No

	NO	YES	A
1 Schreiner, L.			
2 Stargardt, G.			
3 Olsen, D.			
4 Nelson, G.			
5 Draves, D.			
6 Josephson, K.			
7 Schulhauser, D.			
8 Reigel, L.			
9 Jirschele, M.			
10 Kupfer, J.			
11 Martin, H.			
12 Bochnung, B.			
13 Lane, G.			
14 Reigel, D.			
15 Hiesz, S.			
16 Raubal, J.			
17 Kumm, A.			
18 Joosten, L.			
19 Bowden, C.			
20 O'Donnell, H.			
21 Hofmeister, N.			
22 Hendrickson, M.			
23 Fein, D.			
24 Hokamp, M.			
25 Falcosky, C.			
26 Conrad, J.			
27 Weiland, B.			
28 Kronseder, H.			
29 Guth, L.			
30 Brehm, R.			
31 Goodness, W.			
32 Gurrer, C.			
33 Rosandick, L.			
34 Brown, R.			
35 Dove, J.			
36 Buchberger, A.			
37 Nash, J.			
38 Melville, D.			

## FISCAL NOTE:

Source of Money: Contingency ☐ Budget ☐

WHEREAS, the Air National Guard (ANG) has had prepared a Draft Environmental Impact Statement (DEIS) which addresses the Hardwood Bombing Range expansion project and associated airspace actions; and

WHEREAS, concerned persons have until November 21, 1997, to respond to the DEIS before preparation of a final EIS, (a final EIS will be used by the ANG and the U.S. Air Force decision-makers to assist in the making of a Record of Decision concerning the Hardwood Range expansion project); and

WHEREAS, the Volk Field Committee (Committee) has found the DEIS to be sorely lacking in meeting its function of assessing the impact of the proposed range expansion and the viability of alternatives; and

WHEREAS, the Committee has prepared a County response to the DEIS, see attached, which identifies its deficiencies, which the Committee seeks the entire Board's adoption of; and

WHEREAS, the County Board, by means of Resolution 95-2-4 went on record in February of 1995, in strong opposition to the expansion of the Hardwood Bombing Range into Wood County; and

WHEREAS, since that time the Committee has continued to study the impact of such an expansion into Wood County and the alternatives to it; and

WHEREAS, certain residents of Wood County have succinctly related problems associated with the proposed expansion, including:

"There are virtually no four-lane roads in Wood County to transport people and business products. People seeking to expand business into Wood County would not put up with the travel limitations we have, either by lack of four-lane highways or the need to fly around the MOA (military operations area) by plane. Expansion of the Hardwood Bombing Range will have a direct negative economic welfare impact for current businesses in Wood County and potential businesses looking at relocating to Wood County."

Michael A. Schmidt, President & CEO, St. Joseph's Hospital.

Adopted by the County Board of Wood County, this 21 day of Oct, 19 97  
 County Clerk [Signature] County Board Chairman [Signature]

WOOD COUNTY



RESOLUTION# \_\_\_\_\_

ITEM # 4-2  
DATE October 21, 1997  
EFFECTIVE: October 21, 19

Page 2

Introduced by Volk Field

\_\_\_\_\_  
Committee

WHEREAS, the Volk Field Committee recommends that Wood County persevere in its efforts to oppose the expansion of the Hardwood Bombing Range into Wood County,

NOW, THEREFORE, IT IS HEREBY RESOLVED BY THE WOOD COUNTY BOARD OF SUPERVISORS that:

A. The County Board Chairman and County Clerk execute the attached response to the Draft Environmental Impact Statement.

B. Wood County continues its strong opposition to the expansion of the Hardwood Bombing Range into Wood County.

C. The Volk Field Committee is directed to utilize available means of communicating to inform the public about the detrimental impact on Wood County that would result from an expansion of the Hardwood Bombing Range into Wood County and to work with political leaders to prevent it.

Adopted by the County Board of Wood County, this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

\_\_\_\_\_  
County Clerk

\_\_\_\_\_  
County Board Chairman



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

RESPONSES TO COMMENTS

Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

Response to Comment No. 2

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

REPLY TO THE ATTENTION OF:

OCT 22 1997

B-19J

Air National Guard Readiness Center  
Program Manager, Hardwood Range EIS  
ANGRC/CEVP  
3500 Fetchet Avenue  
Andrews Air Force Base, Maryland 20762-5157

Dear Mr. Harry Knudsen, Jr.:

We have reviewed the Draft Environmental Impact Statement Addressing the Hardwood Range Expansion and Associated Airspace Actions (Draft EIS) in southwest Wisconsin. This project's purpose is to increase the land area of the Harwood Range; add a new area for potential target locations, a drop zone, and a landing zone; modify its associated restricted airspace; and reassess the annual sortie utilizations of three Military Operations Areas.

Based on our review, we have rated the Draft EIS as "EO-2". The "EO" means we have identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative. The "2" means that the Draft EIS does not contain sufficient information to fully assess environmental impacts. This rating will be published in the Federal Register.

The Draft EIS suggests some adverse impacts on wetlands. The type, function, and value of wetlands as well as the amount of wetlands impacted must be identified in the Final EIS. The Section 404(b)(1) guidelines of the Clean Water Act require that every effort be made to avoid project-related losses of wetlands. Generally, the project alternative that meets the purpose and need of the project with the least potential for adverse impacts on naturally-occurring wetlands must be selected for implementation. In addition, all demonstrably unavoidable wetland losses must be compensated. We recommend that a minimum of 1.5 acres of compensatory wetlands be provided for each acre of naturally occurring wetlands unavoidably lost due to project implementation activities. The compensatory wetlands should be located as close as possible to the area where the project-related impacts are likely to occur, and should be designed to replicate, as closely as possible, the types, functions and values of the impacted wetlands. A mitigation plan for unavoidably lost wetlands due to project implementation must be included in the Final EIS.

For trees that will be lost due to project implementation, we recommend that compensation be provided. We recommend that trees be replaced with native saplings, if practicable, at a minimum

259

1

2

DH41/G

Michael

MacMullen

ratio of 1:1, and that they be placed as close as possible to the impacted areas. Replacement of removed trees would provide erosion control, increase the drainage capacity of the area, and would help mitigate any loss of wildlife habitat. With regard to the disposal of removed trees, to avoid landfill disposal, we recommend that they be placed in a forested area to provide habitat to wildlife, or provided to the community for firewood and/or mulch.

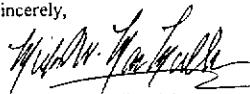
Every effort should be made to avoid and minimize adverse impacts to the area's wildlife, and measures should be taken to compensate for wildlife habitat that is unavoidably lost due to road construction, such as creating wildlife crossing corridors and protecting nearby wildlife habitat from future development, perhaps through a conservation easement.

With regard to construction activities, we recommend that the contractor be required to control noise and exhaust fumes emitted by construction equipment by installing control devices and employing prescribed control methods.

With regard to the disposal of construction and demolition waste associated with the proposed project, every effort should be made to avoid landfill disposal. Construction and demolition waste make up approximately 25% of the material in U.S. municipal landfills, and roughly 90% of this waste can be recycled. We recommend that uncontaminated waste materials be reused or recycled whenever possible. Also, as an energy conservation measure, we recommend that energy efficient lights be considered for installation and use.

Thank you for the opportunity to review this project. We look forward to reviewing the Final EIS as soon as it becomes available. If you have any questions, please contact Nancy Mugavero of my staff at (312) 353-4890.

Sincerely,



Michael MacMullen, Manager  
Federal Facilities Program  
Office of Strategic Environmental Analysis

## RESPONSES TO COMMENTS

### Response to Comment No. 3

Disturbed areas will be revegetated with native plant species wherever practicable.

### Response to Comment No. 4

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 5

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 6

During construction and maintenance activities on the Range, Best Management Practices as prescribed by the state of Wisconsin would be used. Waste Material would be recycled as practicable. Solid Waste is discussed in Subsection 3.4.1 and 4.4.2.

### Response to Comment No. 7

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



TOWN OF PORT EDWARDS, NEKOOSA, WI 54457

## RESPONSES TO COMMENTS

### Response to Comment No.1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

November 5, 1997

Air National Guard Readiness Center  
Program Manager, Hardwood Range EIS  
ANGRC/CEVP  
3500 Fetchet Avenue  
Andrews Air Force Base, MD 20762-5157

The Board of the Town of Port Edwards, voted unanimously to go on record in opposition of the proposed expansion of the Hardwood Bombing Range.

We, the undersigned Town of Port Edwards Board, would like to voice our opposition to the proposed expansion of the Hardwood Bombing Range into the Wood County area.

It is evident that there are no benefits for Wood County should the range be expanded as proposed, yet there are serious negative impacts. Wood County and the State of Wisconsin will lose over 6,000 acres of irreplaceable forestland currently being used for recreation, wildlife habitats, wetland preservation and timber production. Furthermore, attempts by Wood County to identify replacement lands have been met with persistent, severe opposition. Each taxpayer in Wood County will sustain severe losses from any action that disintegrates our ability to attract, retain, or expand existing business and industry.

The people of Wood County and the Town of Port Edwards Board have aggressively fought to continually improve our area and will continue to do so.

Lugh O'Donnell CHAIRMAN  
James Eglar SUPERVISOR  
Robert Brunwald SUPERVISOR  
Shawn Skelton CLERK  
Barbara Kniprath TREASURER

00516

Hugh

O'Donnell

November 13, 1997

Program Manager, Hardwood EIS  
Environmental Planning and Airspace Branch  
Air National Guard CEVP  
3500 Fetchet Avenue  
Andrews AFB, MD 20762-5157

Gentlemen:

Re: Proposed Hardwood Bombing Range Expansion in South Wood County

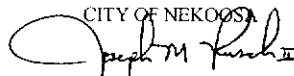
The Nekoosa Common Council has gone on record as **opposing** the proposed expansion of the Hardwood Bombing Range into South Wood County, Wisconsin.

We realize the critical role Military Airpower plays in the protection of domestic and foreign interests of the United States; however, this military facility should remain in Juneau County, Wisconsin.

Federally owned land in Juneau County is available near the existing Hardwood Range which would meet the Federal Government's needs in assuring the future of this facility as well as the economic benefits the communities of Mauston, Necedah, New Lisbon, and Camp Douglas receive from the Military facilities located in that region of Wisconsin.

Your efforts to keep this facility from expanding into South Wood County would be greatly appreciated.

Sincerely yours,

CITY OF NEKOOSA  
  
Joseph M. Rusch II  
City Clerk

Enclosures

## RESPONSES TO COMMENTS

### Response to Comment No.1

The Air National Guard has no jurisdiction to acquire lands presently under the administration of another Federal agency. Lands such as the Necedah National Wildlife Refuge already have a specific mission in their own right and therefore represent an extremely undesirable alternative to fulfill the need express by the Proposed Action.

262

1



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Great Lakes Region  
Illinois, Indiana, Michigan,  
Minnesota, North Dakota,  
Ohio, South Dakota,  
Wisconsin

2300 East Devon Avenue  
Des Plaines, Illinois 60018

## RESPONSES TO COMMENTS

NOV 17 1997

Program Manager  
Hardwood Range EIS  
Air National Guard Readiness Center  
ANGRC/CEVP  
3500 Fetchet Avenue  
Andrews Air Force Base, MD 20762-5157

Dear Sir or Madam:

Thank you for the opportunity to review the Draft Environmental Impact Statement addressing the Hardwood Range Expansion and Associated Airspace Actions. The FAA, Great Lakes Region, Airspace Division offers the following comments and observations concerning this document.

1. On page viii, the 2<sup>nd</sup> proposed action, "Modify the Restricted Airspace Associated with the Hardwood Range", is a proposal that would require additional review by the FAA. The Minneapolis ARTCC, is the controlling agency of these restricted areas. As of this date the ARTCC has not completed an evaluation of the proposed changes to R6904A & R6904B proposed by the ANG in this DEIS. } 1
2. On page xi, the legend indicates that short dashes and long dashes are both R6904A. The long dashes should be an indication of R6904B. } 2
3. On page 1-8, 2nd paragraph states that the ANG determined that modifying the vertical and lateral boundaries of R6904A&B could be accomplished. Any proposed change to the vertical limits of R6904A or R6904B would require additional investigation by the FAA. (See item 1.) } 3
4. On page 1-9, in the section titled "Mandatory Criteria" a statement is made that "the airspace must be as free as possible of airways..." the MOA's referred to in this DEIS have numerous airways traversing them. } 4
5. On page 2-1, the last paragraph mentions expansion of R6904, (see comments item 1.) } 5
6. On page 2-4, the legend is incorrect. (See item 2.) } 6

### Response to Comment No. 1

It is correct that the Minneapolis ARTCC has not completed a review of this proposal. The ANG will work with the FAA to incorporate resulting review input into the planning process for the proposal.

### Response to Comment No. 2

Comment noted. Corrections have been made to the figure identified.

### Response to Comment No. 3

See response to Comment No. 1.

### Response to Comment No. 4

This criteria applies to proposals for new or modified airspace. While the MOAs referred to in the proposal have several airways traversing them, the MOAs are not being modified. The criteria apply to R-6904B airspace since that is the only airspace proposed for modification. When viewed from that perspective, the criteria are satisfied.

### Response to Comment No. 5

See response to Comment No. 1.

### Response to Comment No. 6

Comment noted. Corrections have been made to the figure identified.

7. On page 2-10, Table 2-2 indicates a dramatic increase in Other aircraft type, from 38 to 750, since this category includes various types of aircraft, the environmental impact will vary depending upon which aircraft actually use the airspace.
8. On page 2-20, Table 2-6 indicates that the "Proposed Action Assessment" is not applicable for R6904, because the existing assessment of 4,992 sorties will not be changed. This may be true; however, the proposed increase in the number of sorties in the three MOA's is nearly 50%. This indicates that the actual use of R6904 will increase dramatically, from less than 3,000 sorties per year during each of the past 4 years, to an unspecified number, up to the assessed level of 4,992.
9. On page 2-22, section 2.6.1.1 indicates that R6904 will change in size. (See comment 1.)
10. On page 3-6, the legend is incorrect. (See item 2.)
11. On page 3-44, Table 3-13 breaks down all 4,992 sorties in R6904 by type aircraft, why wasn't this done in Table 2-2 on page 2-10 where 750 sorties were labeled other?
12. On page 4-2, section 4.1.1.2 indicates that potential airspace impacts were assessed using a general evaluation. Any evaluation of the impact that expansion of R6904 would have on air traffic operations would have to be done by the FAA. This has not been done as of this date.
13. On page 4-3, section 4.1.2.2 indicates expansion of R6904 to FL250 or higher. (See comments on item 1.)
14. On page 4-4, in the 1<sup>st</sup> paragraph, the statement is made that "expansion of R6904 would not conflict with any federal airways, transition areas, or airport-related air traffic operations, and no significant impacts would be expected". The FAA does not agree with this statement, Minneapolis ARTCC uses the airspace above R6904 for aircraft arriving at Minneapolis, MN.
15. On page 4-14, section 4.3.2 states that overall numbers of operations on the range would be unchanged. This should state number of allowable operations would not change. The number of operations proposed, as compared to the actual operations over the past 4 years, is dramatically higher.
16. On page 4-33, section 4.7.2.2 states that flying operations in R6904A/B would not change as a result of the proposed action. This does not appear to be correct; the number of operations would increase over the actual operations during the last 4 years. The emissions, however, would not be greater than the baseline presented in Section 3.7.2.
17. On page 4-65, section 4.11.2.2. (See comments at 16.)

## RESPONSES TO COMMENTS

### Response to Comment No. 7

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 8

An aircraft typically uses several MOAs and/or MTRs on a single training flight. For example, a single aircraft may fly a single training flight through VR-1616, the Hardwood Range airspace (R-6904), and the Volk South MOA. This one sortie would be counted in each of the sortie totals for each of these airspaces. Therefore, the totals shown in the table for each airspace component cannot be added together to produce a total sortie count for the overall Proposed Action, as this would over-count the sortie totals.

### Response to Comment No. 9

See response to Comment No. 1.

### Response to Comment No. 10

Comment noted. Corrections have been made to the figure identified.

### Response to Comment No. 11

Section 2 provides summary information for more detailed information and analyses presented later in the EIS.

### Response to Comment No. 12

See response to Comment No. 1.

### Response to Comment No. 13

See response to Comment No. 1.

### Response to Comment No. 14

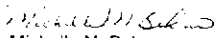
See response to Comment No. 1.

### Response to Comment No. 15

Statements in Subsection 4.3 concerning the fact that sorties on the range would not change as a result of the proposed action refers to the numbers of sorties that were considered in Subsection 3.3, which described the affected environment under baseline conditions.

Any questions concerning this review should be directed to Environmental Specialist Wally Welter at 847-294-7832.

Sincerely,

  
Michelle M. Behm  
Manager, Airspace Branch,  
Great Lakes Division

## RESPONSES TO COMMENTS

### Response to Comment No. 16

The sortie data that were obtained for the EIS analyses indicated that the number of flying operations at the Hardwood Range would not change as a result of the proposed action. If the sortie operations would change, then the last sentence in this comment would be true only if the number of sorties would decrease as a result of the proposed action, or if the proposed action included a redistribution of sorties toward aircraft which have lower emission factors. According to available data, the sorties at the Hardwood Range would neither change nor be redistributed to other aircraft types as a result of the proposed action.

United States Senate  
WASHINGTON, DC 20510

November 19, 1997

Lt Col Kent Adams  
Program Manager, Hardwood EIS  
Air National Guard CEVP  
3500 Fletcher Avenue  
Andrews AFB, MD 20762-5157

Dear Lt Col Adams:

We are writing to express our concerns associated with the Draft Environmental Impact Statement (DEIS) studying the proposed expansion of the Hardwood training range and related airspace changes.

First of all, we would like to thank the National Guard for their efforts to solicit public input into this process. We appreciate the challenge of providing concerned residents the opportunity to share their views about the proposed action, and feel the actions of Guard staff in this area have been significant.

With the downsizing of our nation's active duty military we understand and appreciate the increased role the National Guard plays in our overall force structure. We know the men and women of the Wisconsin National Guard have served with honor and distinction performing real world missions around the globe. We also understand the importance of increased training opportunities to insure that these forces are prepared for these missions in the future.

Our offices have been following this proposed expansion closely since proposed in 1994 and have actively participated in both formal and informal meetings designed to better understand the proposal and how it may affect area residents. Based on these contacts we have identified several areas of the DEIS that we feel need to be addressed in more detail as the Final Environmental Impact Statement (FEIS) is prepared.

- **Land acquisition.** The proposal calls for expansion of the current range boundaries by 7,137 acres, including 6,162 acres currently enrolled by Wood County in the State of Wisconsin Forest Program. While the DEIS does address the loss of tax revenue to various local governmental units, it should further address the more important issue of replacement of forest land in the state program, as well as the economic and social impacts of the loss of recreation space for community residents.

Additionally, the DEIS does not fully address the impact of acquisition issues if Wood

RESPONSES TO COMMENTS

Response to Comment No. 1

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

Land acquisition through condemnation would have similar socioeconomic effects to the acquisition of land through voluntary purchase and sale. Both would be based on the appraised value of the property and in both cases, relocation costs would be paid by the Federal government, private lands would be taken off the tax rolls once they are owned by the Federal government, and the operation and potential socioeconomic effects of the expanded range would be similar.

266

County refuses to lease/sell the property in question. If the potential exists for the land to be acquired using federal condemnation procedures, it is important that the public understand the impacts associated with this acquisition method and have the opportunity to comment on them.

- **Justification for and Environmental Impacts of Landing Strip and Drop Zone.** The DEIS does not provide any information documenting the need for an additional landing strip/drop zone in the area. The research our offices have conducted seems to show adequate training sites for C-130 and other cargo planes already exist in close proximity to Hardwood Range.

In addition, the DEIS should fully document environmental impacts associated with the construction of a landing strip and drop zone in the expanded range. Currently, it neither provides information about the material that would be used in construction, nor does it detail the dimensions of the construction, or specify the exact location where the landing strip and drop zone would be built. The DEIS acknowledges the wetland characteristics of the topography, yet only indicates that adverse impacts are "difficult to predict at this time". Given the potential for strip construction to cause soil erosion, vegetation loss, and impact water quality, additional study is clearly merited. Additionally, if strip construction is to result in wetland loss, mitigation efforts should be fully described in the FEIS.

- **Low Level Flights.** Though low level flight corridors were dropped from this proposal, many residents of southeast Wisconsin have contacted our offices with concerns that no information about this aspect of the previous proposal was contained in the DEIS. While satisfied that the corridors are not presently being studied, residents want more detailed information on the reasons for the withdrawal. Residents have received anecdotal explanations for withdrawal, including impacts on the Kickapoo Reserve, Amish populations and migratory birds, yet none of these are mentioned in the DEIS.
- **Affect on Commercial, Agricultural and Medical Flights in Related Airspace.** While the Guard has indicated that air space managers try to accommodate non-military aircraft in the area, there are insufficient data in the DEIS describing how such coordination and prioritization will take place as military flights increase, particularly as such flights may affect important medical evacuation efforts in the area. Of additional concern is the impact the increased activity in the airspace may have on the regional airports in the vicinity. Additional documentation providing more detail about specific plans to address these concerns would seem to be appropriate.
- **Coordination with Ho-Chunk Nation.** The Nation has indicated that both the range itself and lands adjacent to the range contain sites of archeological and religious significance to the Nation. In addition, Ho-Chunk tribal members live adjacent to the range area. Ho-Chunk leaders have previously indicated that existing range operations have negatively impacted on tribal member activities. While the DEIS states that there are ongoing negotiations with the tribe surrounding these issues, the final EIS should

## RESPONSES TO COMMENTS

### Response to Comment No. 2

The need for the proposed action is addressed in Section 1 of Volume 1 of the EIS.

### Response to Comment No. 3

The ANG firmly commits to not impact wetlands in development of the proposed expansion area. Best management practices would be employed to control soil erosion (i.e., vegetated buffer zones along streams and other sensitive features, use of silt fencing around construction sites, etc.) during construction of the tactical target complex, roads, landing zone, and drop zone, so erosion should be minimal. Much of the Hardwood Range, proposed expansion area, and surrounding areas are comprised of similar wetlands that would continue to function unimpeded at the regional level.

### Response to Comment No. 4

As a result of the public input through the scoping process associated with the Draft EIS, Air National Guard planners obtained information identifying the locations of potentially sensitive areas not previously identified during the DOPAA development process. Much of this public input focused on resources associated with the proposed new southern and southwestern MTR corridors. In consideration of potential environmental impacts to these locations (the Kickapoo Valley area as an example), it was immediately apparent that operational limitations on aircraft activities would need to be adopted for training scenarios in these areas. This determination subsequently led to the conclusion that the proposed southern and southwestern MTR corridors would not represent viable training opportunities that would justify the charting of the new low-level routes. Consequently, the proposals were dropped and plans to complete detailed environmental studies of the proposed new low-level MTR corridors were terminated and no studies were produced. The factors that influenced this decision for the proposed new MTR corridors were not applicable to the existing airspace associated with the range. Furthermore, in light of the operational limitations associated with the proposed new routes, the Air National Guard has no plans to pursue the establishment of the proposed southern and southwestern MTR corridors.

## RESPONSES TO COMMENTS

### Response to Comment No. 5

The proposed range expansion is not anticipated to have an adverse impact on "Spirit of Marshfield" helicopter medevac operations. The Marshfield Base Manager has an agreement with Volk Field personnel which includes procedures to ensure that military flight operations will be curtailed, if necessary, to ensure that "Spirit of Marshfield" flights with patients will have direct, unimpeded access to their destination. In addition, Minneapolis Air Route Traffic Control Center personnel assign the necessary priority to "Spirit of Marshfield" flights to ensure direct light routing. The Marshfield Base Manager has also established an excellent working relationship with Volk Field personnel to ensure that problems are resolved as they are identified.

### Response to Comment No. 6

See response to Comment No. 5.

This proposal will not expand the lateral boundaries of any of the military operations areas (MOAs) that Volk Field personnel currently schedule and manage. Therefore, this proposal should not adversely affect travel for local business executives. Interested parties should call Volk Field (Lt. Col. Young) at (608) 427-1201 to resolve current operations problems involving local and military aircraft. Aircraft on a VFR flight plan are authorized to transit military operations areas (MOAs) at all times at the pilot's discretion. To help determine if the MOA is scheduled to be used during the desired transit time, pilots can call (800) 972-8673 or listen to an ANG-sponsored airspace information system recording broadcast on frequency 120.0 MHz. The ANG initiated this recording as a service to pilots so they can plan their flights knowing the military's planned activities. The aircraft have unimpeded access to MOAs during periods of non use.




clearly indicate that the Guard has fully explored the impact of range expansion on values of importance to the Nation and describe the efforts that the Guard will undertake to mitigate such impacts.

While we appreciate the effort the National Guard has undertaken to address the numerous serious concerns raised by the public about this proposed expansion, we feel additional study into the above mentioned areas is warranted. We appreciate your attention to this matter.

Sincerely,



Russell D. Feingold  
United States Senator



Herb Kohl  
United States Senator

## RESPONSES TO COMMENTS

### Response to Comment No. 7

The ANG has coordinated with the Ho-Chunk Nation in a series of discussions, meetings, and letters from 1996 through 1998. At a meeting in February of 1998, the potential effects of ANG activities on traditional practices and settlement areas was discussed. The discussion also addressed resource identification and avoidance procedures, and archaeological inspection and protection within the proposed expansion area. Coordination was planned to continue at a future meeting. Data documenting the method and frequency of communication with the tribes has been added to Subsection 4.9.1.2 of the EIS. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

The ANG currently has a coordination system in place with the Ho-Chunk Nation that provides for a 5 NM avoidance area during any of their special observances or ceremonies. This system is on an "as called for" basis and is implemented by NOTAM and direct communication with daily users. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

The potential effect of overflights on Native American cultural values, sacred sites, and religious activities is considered in Subsections 4.9.1.1, 4.9.1.2, 4.9.2, 4.9.3, 4.9.4, 4.9.5, and 4.9.6 of the EIS. Subsection 4.9.1.2 has been expanded to include additional information on potential impacts to traditional cultural resources. Judicial proceedings, whether Native American or Euroamerican, are not considered to be cultural resources.

The methods for predicting and evaluating frequent or infrequent noise, and the significance of noise created by the proposed activities are considered in Subsection 4.2.

Guidelines for the preparation of EISs do not require that a complete cultural resource inventory be performed within an area of potential effect. Such guidelines require that a Federal agency proposing an undertaking, in this case the ANG, collect enough information on cultural resources, including Native American values, to make a decision regarding the proposed action and alternatives. The background research conducted for the EIS provides sufficient information to allow the decision maker to weigh the potential impacts to both identified and unidentified cultural resources that would be affected by the alternatives. Such guidelines also allow nondestructive planning prior to an undertaking, as well as phased compliance at different stages of planning. As stated in Subsection 4.9.1.2, The Section 106 Process, cultural resource survey of lands potentially affected by ground disturbance would be completed when an alternative is selected. Identified resources would be evaluated according to National Register criteria, and adverse effects to significant cultural resources (i.e. those that are eligible for the National Register) would be avoided or mitigated. Appropriate levels of mitigation would be determined through consultation among the ANG, the Wisconsin SHPO, the Ho-Chunk Nation, and the ACHP.



## Ho-Chunk Nation Department of Justice

P.O. Box 667 • Black River Falls, WI 54615 • Phone (715) 284-3170  
FAX (715) 284-7851

• Gary F. Brownell, Attorney General •  
Tribal Attorneys:

• Sheila D. Corbinc • Colleen M. Baird •  
• Michael P. Murphy • Todd R. Matha • William A. Boulware, Jr. •  
• Kari L. Kilday, Paralegal •

November 20, 1997

Program Manager, Hardwood EIS  
Environmental Division  
Air National Guard CEVP  
3500 Fetchet Avenue  
Andrews AFB, MD 20762-5157

RE: Draft Environmental Impact Statement

Dear Sir:

I am providing herewith a copy of the Memorandum of Comments on the Draft Environmental Impact Statement [DEIS] for Hardwood Range Air-to-Surface Gunnery Range Expansion and Associated Airspace Actions prepared by the Ho-Chunk Nation Department of Justice.

Please address any communications on this matter to me or William Boulware, Jr.

Sincerely,

Gary F. Brownell  
Attorney General

enc.

cc: Jacob Lone Tree, President of the Ho-Chunk Nation  
William F. Gardner, Legislative Attorney  
Jeff DeCora, Legislative Counsel

# MEMO

**To:** U.S. Air National Guard  
**From:** William A. Boulware, Jr., HCN Department of Justice *WAB/4FD*  
**Subject:** Comments on the Air National Guard Draft Environmental Impact Statement  
**Date:** November 20, 1997 (8:57am)  
**cc:** G. Brownell, Attorney General  
J. Rockman, Office of the President  
Jeff Decora, Legislative Counsel  
Mary Frances Repko, Legislative Assistant to Sen. Feingold  
William F. Gardner, Legislative Attorney  
file *a:\deis.wpd*

---

The following comments are intended for:

Program Manager, Hardwood EIS  
Environmental Division  
Air National Guard CEVP  
3500 Fetchet Avenue  
Andrews AFB, MD 20762-5157

This Memorandum provides the initial comments of the Ho-Chunk Nation [Nation] on the Draft Environmental Impact Statement [DEIS] of the Air National Guard on the environmental consequences associated with the proposed action to expand the Hardwood Air-to-Surface Gunnery Range (land expansion of 7,137 acres) and Associated Airspace Actions. The expansion of the existing Hardwood Range would add a new area for target locations, a drop zone, landing strip, modify the restricted airspace, and modify three Military Operations Areas [MOA]. Communication between the Air National Guard [ANG] and the Nation has been minimal. Listed below are the initial comments of the HCN. The statement is not exhaustive of the comments of the Nation.

On June 6, 1995, the Nation passed Tribal *Resolution 6-14-95D*, a statement expressing the Nation's opposition to the Hardwood Range Expansion. *Resolution 6-14-95D* was re-affirmed by a vote of the Nation's Veterans, Cultural and Public Affairs Legislative sub-Committee on September 4, 1997, providing for continual support of *Resolution 6-14-95D* opposing the expansion of the Hardwood Bombing Range. The then articulated basis for opposition of the proposed expansion of the range was the impact on the Chak-Hah-Chee residents, that the visual Route of

1616 directly over tribal residences and enterprises creates a nuisance, is annoying, and that the ANG flights causes a disruption during religious activities and teachings. There has been effectively no compliance with or consideration given to the AMERICAN INDIAN RELIGIOUS FREEDOM ACT OF 1978 (P.L. 95-341). That Act directs various federal agencies or departments to evaluate their policies and procedures in consultation with native traditional religious leaders to determine changes necessary to protect and preserve Native American cultural and religious practices. See 43 C.F.R. 7

The DEIS does not comment on nor consider the impact of low level flights on religious ceremonies and practices which occur through the year, primarily out-doors. The DEIS does not consider nor have there been attempts to meet with, address or mitigate any harm resulting from the impact of chemical ejections, dropping of ordnance, ground disturbance impact to possible known and unknown archaeological sites, sacred areas, and the affect of tree removal, ground run-off, and increased wind impact to these sites. The concerns for both human health, environmental degradation, and the impact on Ho-Chunk practices, religion, lodges, hunts, medicinal gathering, feasts, and ceremonies is wholly excluded from the DEIS. During several meetings at the HCN Traditional Court of Tribal Clan Leaders and during recorded court proceedings in the Nation's Trial Court, the noise and vibrations generated by low-flight aircraft has interfered with these proceedings. The disturbance is not minimal nor is it negligible to the Nation when judicial, social, religious and political activities are regularly disturbed by air-craft traversing the proposed and standard MOA. The impact adversely affects Ho-Chunk communities and the residents of those communities.

After reviewing the entire DEIS, it is the conclusion of the Nation that the DEIS is insufficient in addressing the concerns of the Ho-Chunk Nation. The ANG has not regularly nor occasionally consulted with the Nation. The DEIS does not take into consideration the cultural resources, traditional cultural properties, the medicinal gathering and sacred sites located within the proposed expansion area of the Hardwood Bombing range. As the DEIS does not address these issues and others of relative importance to the Nation, the DEIS is incomplete and has not fulfilled the dictates of the several Executive Orders and applicable federal statutes.

## RESPONSES TO COMMENTS

### Response to Comment No. 1

The potential effect of overflights on Native American cultural values, sacred sites, and religious activities is considered in Subsections 4.9.1.1, 4.9.1.2, 4.9.2, 4.9.3, 4.9.4, 4.9.5, and 4.9.6 of the EIS. Subsection 4.9.1.2 has been expanded to include additional information on potential impacts to traditional cultural resources. Judicial proceedings, whether Native American or Euroamerican, are not considered to be cultural resources.

The methods for predicting and evaluating frequent or infrequent noise, and the significance of noise created by the proposed activities are considered in Subsection 4.2.

As indicated in Subsection 3.9, traditional cultural resources can include linear and effigy mounds and petroglyphs, as well as intangible resources related to religious practices. In 1978, AIRFA made it U.S. policy to "...protect and preserve for American Indians their inherent right of freedom to believe, express and exercise the traditional religions...including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites." AIRFA was clarified in 1996 by E.O. 13007.

E.O. 13007 requires that Federal agencies "...to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, (1) accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and (2) avoid adversely affecting the physical integrity of such sacred sites." The ANG currently has a coordination system in place with the Ho-Chunk Nation that provides for a 5 NM avoidance area during any of their special observances or ceremonies. This system is on an "as called for" basis and is implemented by NOTAM and direct communication with daily users. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

The proposed action would not affect access to, or physical integrity of, Native American sacred sites that could potentially exist under the Falls 1, Falls 2, and Volk South MOAs because only airspace use is being reassessed. Traditional cultural resources identified in the EIS do not lie within the proposed expansion area. Several cultural resources lie underneath existing airspace not included in the proposed action. As additional resources are made available to the ANG, appropriate analysis will be determined and

## RESPONSES TO COMMENTS

accomplished.

AIRFA also requires agency policy and procedure review and evaluation. However, this is not required as part of the EIS process.

### **Response to Comment No. 2**

The general kinds of Native American traditional cultural resources are identified in Subsection 3.9. Among others, they can include medicinal plants and gathering areas, hunting areas, and sacred sites. Specific identification of these resources must be provided by the Ho-Chunk Nation. Any such information is considered confidential and is not released to the public except by express permission of the Ho-Chunk Nation.

Also, see response to Comment No. 1.

## RESPONSES TO COMMENTS

### Response to Comment No. 3

See response to Comment No. 2.

## RESPONSES TO COMMENTS

### Response to Comment No. 4

The ANG has coordinated with the Ho-Chunk Nation in a series of discussions, meetings, and letters from 1996 through 1998. The meetings have consisted of representatives from the preservation committee, the Ho-Chunk Nation, ANG Headquarters, and members of the Wisconsin ANG. At a meeting in February of 1998, the potential effects of ANG activities on traditional practices and settlement areas was discussed. The discussion also addressed resource identification and avoidance procedures, and archaeological inspection and protection within the proposed expansion area. Coordination was planned to continue at a future meeting. Data documenting the method and frequency of communication with the Ho-Chunk Nation has been added to Subsection 4.9.1.2 of the EIS.

A protocol has been established between the base and the Nation concerning overflights, notification of tribal ceremonies, and points of contact. The Nation has extended an invitation to the Wisconsin ANG to attend upcoming meetings to discuss their mission and provide information on military training. The ANG plans to continue this communication whenever such opportunities are available.

RESPONSES TO COMMENTS

I. LACK OF CONSULTATION:

The DEIS repeatedly mentions that "efforts to identify traditional cultural resources through consultation with Native American groups are on-going." DEIS Parts 3.9.3.1, 3.9.3.2, 3.9.3.3; *see generally* 4.9. Potential effects of aircraft noise is only one element that will adversely or possibly affect adversely these cultural resources of the Ho-Chunk Nation. No consideration, if any, has been given to limits to and denial of access to sacred sites, the limitation on or ability to gather medicinal plants and bark in the proposed expansion of restricted areas, or any other adverse impact and effect on traditional religion and observations of the Nation. Consultation with the Ho-Chunk Nation has been sporadic, infrequent, and not of a genuine nature. There has been no real dialogue or consistent communication with the Ho-Chunk Nation or its duly authorized representatives as required by 36 C.F.R. 60.4 and Executive Order 13007. The Nation, even with its continuing opposition to the proposed expansion, would also like to present possible alternatives or mitigation scenarios for the ANG to consider. This has not been allowed to happen.

5  
6

II. CULTURAL RESOURCES AND TRADITIONAL CULTURAL PROPERTIES:

The DEIS does not specifically address direct impacts to prehistoric and historic archaeological resources as a result of ground disturbances associated with construction, bombing and the expansion of the target, i.e. removal of trees, affect to water drainage patterns, laying of the air-strip, and the drop zone. The DEIS does not specifically address the degradation of the aesthetics, location and surroundings of prehistoric, historic and traditional cultural properties important to the Ho-Chunk Nation. The DEIS does mention potential degradation to such sites as a result of increased noise, which will affect enjoyment and ability of tribal members to practice religious and traditional ceremonies. Finally, the DEIS does not address the physical, audible and visual intrusions on traditional or sacred properties, save by mention of the increased noise possibly resulting from more frequent sorties. This lack of attention to these matters or an effort to address them generally or in detail fails to conform to the minimal requirements of federal laws, regulations and the Executive Orders applicable to the expansion project.

7

Response to Comment No. 5

The Ho-Chunk and Menominee Tribes have been contacted and issues relevant to Native American concerns have been discussed. The Tribes have indicated that further consultation would be necessary should the ANG acquire the land. The ANG currently has a coordination system in place with the Ho-Chunk Nation that provides for a 5 NM avoidance area during any of their special observances or ceremonies. This system is on an "as called for" basis and is implemented by NOTAM and direct communication with daily users. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

Also, see response to Comment No. 1

Response to Comment No. 6

See responses to Comment Nos. 1, 3, and 4.

Response to Comment No. 7

As indicated in Subsection 4.9.1.2, the effect of visual intrusions or aesthetics on traditional cultural resources must be assessed, in part, through consultation with affected Native American groups. These groups can identify potentially sensitive significant traditional locations that may be affected by an action. The ANG is not aware of the existence of any traditional cultural resources within the proposed expansion area. The ANG has not completed a cultural resources survey for the expansion property. Several cultural resources lie underneath existing airspace associated with Volk Field not included in the proposed action. As additional resources are made available to the ANG, appropriate analysis will be determined and accomplished.

Also, see responses to Comment Nos. 1, 2, and 3.



RESPONSES TO COMMENTS

An action results in impact when it alters the property's character. The expansion action may impact the bear, bird, conical, linear and effigy mound sites, it will affect the Ho-Chunk Nation Reservation and reservation populations, the Sunburst Petroglyph, and access to these sacred sites and places. Cultural resources are defined as any prehistoric or historic district, site, building, structure or object considered important to a culture, subculture, or community for scientific, traditional, religious, or any other reason. Traditional cultural properties are one of the three major areas, which also include prehistoric and historic archaeological resources and architectural resources. Only significant cultural resources are evaluated for adverse impacts resulting from the proposed expansion of the Hardwood Range. The ANG concludes that no traditional cultural resources have been formally recorded or identified. The ANG has not considered the impact of intangible traditional cultural resources such as religion, and religious, ceremonial or traditional values that are associated with having access to lands within the proposed restricted areas, as well as minimizing the impact of frequent or infrequent noise disturbances. Protection of these resources and consideration of the impact of the proposed action involved access to sites, the use and possession of sacred objects, and the freedom to worship through ceremonial and traditional rites. The DEIS is deficient in addressing these concerns. Nor has the DEIS articulated the manner, method and frequency of communication with the Ho-Chunk Nation in order to resolve or at least address these concerns.

Historical data indicates that the Ho-Chunk Nation f/k/a the Wisconsin Winnebago, and the Menominee Nation were two of the aboriginal peoples that have used and occupied the lands affected by the proposed action. At least eight (8) historic Winnebago village sites dating to the 18th and 19th centuries are known to be in the Hardwood region. The DEIS reports that no traditional cultural resources have been "formally" recorded within the range or associated airspace. But there are sites and there are cultural resources that need to be protected. The intent of Executive Order 13007 is to provide protection for the intangible traits and character of traditional practices, natural features and sacredness of a site. The spirit of presidential declaration is not being practiced.

8

9

10

**Response to Comment No. 8**

See responses to Comment Nos. 1, 2, and 5.

**Response to Comment No. 9**

The ANG is not aware of the existence of any traditional cultural resources within the proposed expansion area. The ANG has not completed a cultural resources survey for the expansion property. Several cultural resources lie underneath existing airspace associated with Volk Field not included in the proposed action. As additional resources are made available to the ANG, appropriate analysis will be determined and accomplished.

Also, see responses to Comment Nos. 1, 2, 3, and 4.

**Response to Comment No. 10**

The ANG is not aware of the existence of any traditional cultural resources within the proposed expansion area. The ANG has not completed a cultural resources survey for the expansion property. Several cultural resources lie underneath existing airspace associated with Volk Field not included in the proposed action. As additional resources are made available to the ANG, appropriate analysis will be determined and accomplished.

Guidelines for the preparation of EISs do not require that a complete cultural resource inventory be performed within an area of potential effect. Such guidelines require that a Federal agency proposing an undertaking, in this case the ANG, collect enough information on cultural resources, including Native American values, to make a decision regarding the proposed action and alternatives. The background research conducted for the EIS provides sufficient information to allow the decision maker to weigh the potential impacts to both identified and unidentified cultural resources that would be affected by the alternatives.

### III. ENVIRONMENTAL DESTRUCTION:

The DEIS reports no impacts to land use resources are expected. But the DEIS states that there will be tree removal, grading, ground disturbance, construction of fire breaks, development of service roads, maintenance buildings, construction of an air strip, in undeveloped forest, and in forested meadows and wetlands. There will be loss of vegetation and habitat. The DEIS states that the Hardwood Range is surrounded by forests and agriculture. The interior portion of the range, the target impact area, has been cleared of trees.

The DEIS suggests minor impact is expected to occur to earth resources, i.e. ground disturbance, and soil erosion, as a result of construction activities and bombing. The proposed expansion will alter drainage patterns, is likely to increase soil erosion, affect wetlands and possibly change the flood plain. Wetlands and surface water resources are present within the Hardwood ranges and to statement of clarity was provided in the DEIS on the affects to and proposed plans to mitigate damage that would be caused by the proposed expansion. The statement provided at DEIS Part 4.6.4 at 4-29, that a site development plan may minimize the local and regional consequences, does not satisfy the Executive Order 11990 requirement of federal agencies to avoid any long- and short-term impacts associated with alteration, destruction or modification to wetlands.

11

### IV. FAILURE TO ADDRESS ADVERSE AFFECTS ON LAND AND TRADITIONAL CULTURAL PROPERTIES OR TO OFFER A METHOD OF MITIGATION & CONSIDERATION OF ALTERNATIVES:

The ANG has taken the position that the proposed action presents a reasonable action, that the only available alternative to be considered is no action. This is an unacceptable all or nothing proposal. The Nation's concerns focus primarily on preventing harm to and minimizing unavoidable consequences are continuing damage or adverse impact to cultural properties unique or sacred to the Ho-Chunk Nation, its people, and to the history of Wisconsin. The DEIS does not genuinely address or attempt to address any issue. Most of the comments relating to cultural property, cultural resources and earth resources reference consultation with the Native Americans is on-going. Even if this characterization of communications were accurate, which it is not, on going consultation does

12

13

## RESPONSES TO COMMENTS

### Response to Comment No. 11

Subsection 4.6.2 discusses potential impacts that could occur to both surface and groundwater resources. Construction activities and use of the target complex, landing zone, and drop zone could impact drainage patterns within the range expansion area because small diversions or drainages may need to be developed to route drainage around facilities. Localized changes in drainage patterns or routing drainage would not use water and would not affect water quantity in the region. Subsection 4.5.2.3 indicates that use of the tactical target complex and construction activities could increase soil erosion in localized areas, potentially causing impacts to water quality. These impacts would be mitigated and managed through the use of Best Management Practices (BMPs) to stabilize and minimize soil movement at the areas of disturbance. Potential sources of pollutants to surface and groundwater in the range expansion area are from aircraft mishaps (i.e. crashes) and from munitions. These sources and the fate of potential pollutants are discussed in Subsection 3.3.3.1 (Aircraft Mishaps), Subsection 3.3.4.1 (Munitions Use and Handling), and Subsection 3.4.1 (Hazardous Materials and Solid Waste). Based on this information adverse impacts to surface and groundwater quality or drinking water supplies would not be expected. Subsections 4.5.2.3 (Water Quality) were modified to reference the appropriate subsections in Section 3, and discuss conclusions regarding water quality.

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order

009LG

Gary

Brownell

## RESPONSES TO COMMENTS

11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

### **Response to Comment No. 12**

Comment noted (see Section 6 in Volume 1 concerning incorporation of public comments).

### **Response to Comment No. 13**

The ANG has continued to meet with the Ho-Chunk Nation when arrangements could be made with them. The meetings have consisted of representatives from the preservation committee, the Ho-Chunk Nation, ANG Headquarters, and members of the Wisconsin ANG. The Tribe has indicated that further consultation would be necessary should the ANG acquire the land. The ANG currently has a coordination system in place with the Ho-Chunk Nation that provides for a 5 NM avoidance area during any of their special observances or ceremonies. This system is on an "as called for" basis and is implemented by NOTAM and direct communication with daily users. Correspondence associated with those coordination initiatives are presented in Appendix O to the Final EIS.

009UG

Gary

Brownell

not address the requirements in federal law, and the applicable Executive Orders. For example, *Executive Order 11593*, 1971 intended for the protection and enhancement of the cultural environment, 12 U.S.C. 470, requiring agencies to avoid inadvertently destroying properties. Also the National Environmental Policy Act [NEPA] requires that the EIS shall document the results of all cultural resources surveys conducted in addition to identifying the effects of the proposed action to identified National Register listed-eligible properties. The EIS is to describe mitigation plans to the extent they have been resolved with the SHPO and Advisory Council on Historic Preservation. Even a complete and full compliance with the NEPA process does not constitute compliance with all cultural resources legislation and regulations. Without direct information, input, definite comment on the effects or lack of impact to these resources the DEIS is incomplete and deficient as a document needed to meet the NEPA and other federal legal compliance measures. Additionally there is no plan to address access to recreational lands, hunting and fishing areas, recreational trail routes, and sacred sites that might fall within the restricted areas.

In conclusion, the Nation continues to oppose the expansion of the Hardwood Bombing range and considers the DEIS wholly deficient and incomplete as it does not address many of the concerns of the Nation. Consultation with the Nation, directly, must take place. Additionally none of the following statutes were mentioned or addressed by the DEIS, even though much of the DEIS focused on control and affect of increase noise levels, the NOISE CONTROL ACT OF 1972 (P.L. 92-574); the NOISE POLLUTION AND ABATEMENT ACT OF 1970 (P.L. 91-604); and the QUIET COMMUNITIES ACT OF 1978 (P.L. 95-609).

## RESPONSES TO COMMENTS

### Response to Comment No. 14

As indicated in Subsection 4.9.2.1 of the EIS, no cultural resource surveys have been conducted in the proposed Hardwood range expansion area. The results of existing cultural resource studies in the vicinity of the range are characterized in Subsection 3.9.2.1 of the EIS. The information presented provides only a general description of study results because specific site location information is protected from public disclosure under NHPA.

As stated in Subsection 4.9.1.2, cultural resource surveys of land potentially affected by ground disturbance would be completed once the ANG has selected a course of action. If National Register-eligible properties are located during a survey, adverse effects to these resources would be avoided or mitigated in compliance with Section 106 of NHPA. Appropriate levels of mitigation would be determined in consultation among the ANG, the Wisconsin SHPO, the Ho-Chunk Nation, and the ACHP.

Potential adverse effects to cultural resources that may be identified within the expansion area are described in Subsection 4.9.2.1.

Also, see response to Comment No. 3.

### Response to Comment No. 15

Relevant land use issues associated with the expansion area under the restricted airspace were addressed in Subsection 4.10

### Response to Comment No. 16

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



IN REPLY REFER TO

## United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Custom House, Room 244  
200 Chestnut Street  
Philadelphia, Pennsylvania 19106-2904

## RESPONSES TO COMMENTS

November 20, 1997

ER-97/499

Mr. Harry A. Knudsen, Jr.  
Chief, Planning Branch  
Air National Guard Environmental Division  
ANG/CEVP  
3500 Fatchet Avenue  
Andrews AFB, Maryland 20762-5157

Dear Mr. Knudsen:

As requested, the Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (EIS) for the Hardwood Range Expansion and Associated Airspace Action, Juneau and Wood Counties, Wisconsin. We offer the following comments relative to potential range expansion and flight impacts to endangered species, migratory birds, fish and wildlife habitat, National Wildlife Refuge lands, and wetland resources.

### GENERAL COMMENTS

The Draft EIS provides an adequate general overview of each of the proposed actions, with sufficient information provided to allow the reader to understand the general nature of each of the proposals. However, the specifics associated with each of the proposals are poorly presented or not presented at all, and the conclusions reached within each of the sections of the document are poorly supported or not supported at all by the facts presented. The summary comments at the end of each of the sections routinely conclude that little or no effects are anticipated, based upon the information presented. However, the Draft EIS often glosses over the negative aspects of each of the analyses, and fails to integrate the data presented with the facts related to previous and ongoing operations of the existing Range. The Draft EIS does not provide enough information to allow for an adequate assessment of potential impacts of the proposed action on fish and wildlife resources. Conservation or mitigation measures to offset likely effects of the proposed

1

2

### Response to Comment No. 1

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 2

The research completed to support the preparation of the Hardwood Range EIS follows the use of various accepted scientific methodologies used to analyze pertinent potential impacts. These analyses have been prepared by qualified scientists and engineers who perform these services for a variety of customers, including the ANG. Copies of all material used in the preparation of the EIS is available on reserve at the Mauston, WI public library.

012143

Don

Henze

## RESPONSES TO COMMENTS

2  
action also have not been described in adequate detail. We recommend that the Air National Guard (ANG) coordinate with the U.S. Fish and Wildlife Service (FWS) to resolve concerns addressed in the following Specific Comments sections prior to completion of the Final EIS. The Final EIS should reflect the results of such consultations and include commitments to appropriate conservation and mitigation measures. 3

### SPECIFIC COMMENTS

#### Fish and Wildlife Resources

##### Wildlife Habitat

One part of the proposed action is development of the ground-based facilities planned within the expansion area. This is expected to result in the loss of wildlife habitat through disturbance and conversion to other uses. The Draft EIS fails to present a detailed description of these proposed facilities, including an accurate estimate of the acres impacted. Based upon the descriptions provided, it appears that a relatively small percentage of the total expansion area would be subjected to the physical disturbance of clearing and construction. However, as the total acreage of the proposed expansion is more than 7,000 acres, disturbance of even a small percentage of this total area could result in a potentially significant loss of wildlife habitat. 4

As acknowledged in the Draft EIS, the clearing of forested areas may result in benefits to wildlife through the creation or enhancement of habitat for some species. However, the ultimate tradeoffs between positive and negative effects of the clearing and construction activities and the level of impacts to fish and wildlife habitat cannot be determined because information in the Draft EIS is insufficient to make an adequate evaluation. The Final EIS should present more detailed descriptions of the proposed facility improvements.

##### Migratory Birds

As acknowledged in the Draft EIS, certain species of wildlife can be sensitive to low-level overflights of aircraft. The degree of harm associated with overflights is dependent upon a number of factors, including the type of aircraft, the distance from the wildlife, the stage of the reproductive cycle, and time of day. The response of different wildlife species to this type of disturbance can range from the loss of an entire year of reproductive production, to that of acclimation and acceptance of

#### Response to Comment No. 3

The FWS has provided the ANG with a letter dated November 9, 1999 (see Appendix G) concurring with the approach the ANG is pursuing, and has agreed the dialog will continue should the plans for the proposal become more firm.

#### Response to Comment No. 4

The ANG firmly commits to not impact wetlands in development of the proposed expansion area. Best management practices would be employed to control soil erosion (i.e., vegetated buffer zones along streams and other sensitive features, use of silt fencing around construction sites, etc.) during construction of the tactical target complex, roads, landing zone, and drop zone, so erosion should be minimal. Much of the Hardwood Range, proposed expansion area, and surrounding areas are comprised of similar wetlands that would continue to function unimpeded at the regional level.

## RESPONSES TO COMMENTS

the disturbance, with little or no effects. Certain species such as bald eagles (*Haliaeetus leucocephalus*) are often very sensitive to disturbance in the vicinity of the nest, potentially resulting in nest abandonment. When concentrations of migratory birds such as waterfowl are subjected to low-level overflights, large numbers of birds can be disturbed from resting areas. This could create a safety hazard for aircraft, and could also result in the excess expenditure of energy by the birds during a period when they have a need to conserve and replenish body reserves. This could possibly result in increased mortality for some bird species during critical migration periods.

The Draft EIS presents data showing how the species which occur in the vicinity of the Hardwood Range could be affected by overflights. The Draft EIS also indicates that flight activities over sensitive areas could be restricted so as not to alter the visual environment of these areas. However, the statement is then made that impacts on visual resources as a result of the proposed changes in Military Operations Areas (MOA) utilization are expected to be low to none. According to FWS staff, low level flights are a common occurrence over the Necedah National Wildlife Refuge (NWR), contrary to the assertion in the Draft EIS that such areas are avoided as standard current practice. As the area supports significant utilization by migratory birds, it is important that the Necedah NWR provide a location free from the disturbance of low level overflights. Given that the FWS believes that there are presently frequent violations of the existing avoidance procedures, the Department is concerned that such incidents will increase with any increase of the usage of the Hardwood Range or associated MOAs.

In addition to the Necedah NWR, which is located directly west of the Hardwood Range, other federal lands in this area are similarly at risk from the proposed action and are of concern. The Meadow Valley Wildlife Area, which is located just west of the Necedah NWR, is owned by the FWS, but is managed by the Wisconsin Department of Natural Resources. The Yellow River Preservation Unit, located just south of the Hardwood Range, is an 18,000-acre area of the Yellow River corridor which currently is in private ownership, but was recently approved to be acquired by the Necedah NWR from willing sellers when funds are available. These two areas also are important to migratory birds and nesting bald eagles and are potentially threatened by the proposed action if training flights are not conducted in a manner to avoid or minimize disturbance.

Although the Draft EIS states that all flights for each of the MOAs are subsonic, sonic booms occur routinely in and near the

**Response to Comment No. 5**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

**Response to Comment No. 6**

The EIS text has been modified to include this information. Mitigation measures for aircraft overflights are discussed in Subsection 4.8.6. As identified in Subsection 4.11.2.2, special flight restrictions are instituted over Necedah NWR. However, it was not stated that it would be avoided. Operating instructions and regulations are set to prevent pilot infractions. If a pilot is unable to meet the demands of military flying, there are administrative steps that are used to remove them from flight. USAF airspace rules apply to all DOD participants.

**Response to Comment No. 7**

Coordination with the USFWS is ongoing and will continue, as appropriate, prior to implementation of the proposal, as required by Section 7 of the Endangered Species Act.

## RESPONSES TO COMMENTS

### **Response to Comment No. 8**

Subsection 4.8.1 of this EIS discusses noise impacts to wildlife. There is evidence in the scientific literature that startle or panic responses to noise do occur in some wildlife species. However, existing studies suggest that these short-term responses do not result in long-term population impacts. A study conducted in North Carolina concluded that "the low response rate of waterfowl behaviors to the presence of aircraft in this study suggested that waterfowl either did not perceive the aircraft as a stressor, or that they became habituated to the presence of aircraft due to repeated exposures over time" (Fleming et al. 1996). Also, the same study found that nesting rates, nesting success, the number of eggs laid, the number of eggs hatched, and nest desertion rates were the same in areas with aircraft overflights and areas without aircraft overflights. However, the study did find that duckling exposed to airport-related aircraft noise grew slower and weighed 4.6 percent less than ducklings not exposed to noise. The existing noise levels and any changes in noise should the proposal be implemented, do not result in the levels of noise related to airport activity. As reported in the study conducted by Ellis et al. 1991, low-level overflights and mid- to high-altitude sonic booms did not have long-term adverse impacts to nesting raptors (refer to Subsection 4.8.1.3).

For species that may not reuse nesting sites or have multiple roosting or nesting sites, avoidance of known bird concentration areas may not be feasible. However, as discussed above and in Subsection 4.8.1.3 of the EIS, intermittent overflights of bird nesting or roosting areas are unlikely to result in long-term adverse impacts to raptors, waterfowl, or other birds.



## RESPONSES TO COMMENTS

4

Necedah NWR. This type of disturbance could result in additional adverse effects to migratory birds. The overflight issue is of significant concern and should be resolved prior to issuing the Final EIS.

### Wetlands

Clearing and construction associated with development of new ground-based facilities within the expansion area will likely involve the dredging and/or filling of wetlands. The ANG should work with the FWS and other Federal and State resource and regulatory agencies in order to: 1) site the facilities to avoid wetland areas to the extent possible, 2) minimize adverse wetland impacts at the selected site, and 3) develop an adequate compensatory mitigation plan to offset the adverse wetland impacts that remain after all appropriate avoidance and minimization have been accomplished. In-kind compensatory mitigation is generally preferable to out-of-kind for replacing the functions and values of the impacted wetlands.

9

Due to its greater likelihood of successful implementation and realization of true net gains in wetland functions and values, wetland restoration is preferable to wetland creation or enhancement. Restoration could include the restoration of drained wetlands, farmed wetlands, or prior-converted wetlands. The compensatory mitigation plan should include a summary of the wetland functions and values associated with the wetlands to be lost, engineering quality drawings depicting the proposed mitigation, a monitoring plan that extends over at least a 5-year period, and a plan to protect the site in perpetuity such as through a conservation easement or land transfer to a resource agency. The elements of the mitigation plan should be outlined in the Final EIS.

### Refuge Lands

National Wildlife Refuge lands provide fish and wildlife habitat and populations for the benefit and enjoyment of the American public. This includes recreational uses such as birding, fishing, hunting, hiking, and many other outdoor recreational activities. The enjoyment of such outdoor activities can be substantially diminished by the disturbance associated with low-level overflights of NWR lands. The Draft EIS consistently makes the statement that flight activity could be restricted to minimize or avoid different types of impacts, yet does not specifically identify sensitive areas, or a procedure that would ensure that such measures would be implemented. Prior to issuing the Final EIS, the ANG should consult with the FWS and resolve

10

### Response to Comment No. 9

The ANG firmly commits to not impact wetlands in development of the proposed expansion area; however, Executive Order 11990 which calls for "no net loss of wetlands" does not preclude the development of projects within a wetland as long as no practicable alternatives exist and that the proposal includes all practicable measures to avoid wetlands impacts. Assuming the expansion is approved, the proponent would be required to obtain an individual Clean Water Act Section 404 permit for any activities occurring within wetlands or other waters of the United States. Issuance of a Section 404 permit requires a demonstration that the Section 404 (b)(1) Guidelines have been followed. The Guidelines require that the project avoids and minimizes impacts to wetlands to the extent possible and provide mitigation for unavoidable impacts. Once specific designs and locations for the landing zone, drop zone, and target area(s) are available, the ANG will conduct jurisdictional wetland delineations to facilitate the assessment of specific project components (and alternatives) on wetland resources, as applicable. Subsection 4.6.2.4 of the EIS discusses requirements under Executive Order 11990, Protection of Wetlands, Section 404 of the Clean Water Act, and Chapter NR 299 of the Wisconsin Administrative Code.

### Response to Comment No. 10

See response to Comment No. 7.

## RESPONSES TO COMMENTS

5

low-level overflight conflicts. The Final EIS should more thoroughly describe the sensitive areas to be avoided, the methods to monitor compliance, and a procedure for resolution of disputes arising from deviation from stated procedures.

On January 15, 1993, the Federal Aviation Administration (FAA) signed an Interagency Agreement (copy enclosed) with the National Park Service, the FWS, and the Bureau of Land Management aimed at reducing low level flying over natural resource areas. Pursuant to this Agreement, the FWS will be seeking the assistance of the FAA in determining an appropriate monitoring and reporting system for flights that may be in violation of the FAA-requested minimum altitude of 2,000 feet above ground level in airspace over lands owned or administered by the FWS.

11

### Endangered Species Act Comments

Based upon a review of their files, the FWS concurs that the federally listed species identified in the Draft EIS constitute an accurate listing of the species known to be present within the area of the proposed projects.

The proposed expansion of ground-based facilities at the Hardwood Range, along with changes in the utilization levels of each of the three MOAs addressed within the Draft EIS, could have adverse effects on the gray wolf (*Canis lupus*), and Karner blue butterfly (*Lycaeides melissa samuelis*), both listed as endangered, and the bald eagle (*Haliaeetus leucocephalus*), listed as threatened. However, the information presented in the Draft EIS is insufficient to make a determination. Based upon available information, it appears that the construction of ground-based facilities in the expansion area could potentially result in adverse effects to the gray wolf and the Karner blue butterfly. The proposed expansions of the three MOAs associated with the action have the potential for adversely affecting the bald eagle through low-level flights over sensitive nesting and roosting areas.

12

The proposed expansion in use of several MOAs is likely to result in an increase in low-level overflights of feeding, nesting and roosting areas for bald eagles on the Necedah NWR, along the Wisconsin River, and at other locations within the MOAs. The degree to which these activities will affect the bald eagle is largely dependent upon the extent to which avoidance procedures are implemented. The Draft EIS makes frequent reference to the fact that avoidance procedures could result in minimal impacts. However, avoidance measures which are said to represent current practice are not always followed, and the means for assuring

13

### Response to Comment No. 11

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 12

See response to Comment No. 7.

### Response to Comment No. 13

See response to Comment No. 7.

compliance with recommended measures have yet to be identified. Therefore, we currently possess insufficient information to determine whether the bald eagle will be adversely affected by the proposed projects.

Gray wolves are known to be present in areas just west of the existing Hardwood Range, and may occasionally occur on the property. There also is the possibility that future expansion of the wolf population could result in the establishment of a pack whose territory encompasses the Hardwood Range. While wolves generally can be tolerant of man's activities, they are very sensitive to disturbance near their den or rendezvous sites. Therefore, there remains the potential for adverse effects on the species due to the sounds and human activity associated with bombing range use. If information becomes available that indicates that wolves would be adversely affected, the ANG should enter into formal section 7 consultation with the FWS.

14

#### Response to Comment No. 14

See response to Comment No. 7.

Karner blue butterflies could potentially benefit from the clearing of forested areas for construction of facilities. The document states that the area proposed for range expansion was surveyed for the butterfly, and its host food plant wild lupine (*Lupinus perennis*). This survey resulted in the identification of several areas of wild lupine, but no Karner blue butterflies. However, this does not preclude the possibility that the butterfly may be present within the areas proposed for development, or that it may ultimately invade those areas when they are cleared for construction.

15

#### Response to Comment No. 15

See response to Comment No. 7.

To determine the effects of the proposed projects on the gray wolf and the Karner blue butterfly, more details on plans for construction of facilities are needed.

As acknowledged in the Draft EIS, a number of Federal species of concern are known from the area. These are taxa for which information now in possession of the FWS indicates that proposing to list them may be appropriate, but for which conclusive data on biological vulnerability and threat are not currently available to support proposed rulemaking. Possible impacts to these species are unknown, but the FWS advocates conservation measures for all candidate species which would preclude the need for Federal listing.

One species of concern which is known from this area of the State and which likely occurs within the proposed action area is the eastern massasauga rattlesnake (*Sistrurus catenatus*). This species requires a combination of both wetland and upland habitats to fulfill all of its life requirements. The population

## RESPONSES TO COMMENTS

7

associated with the Yellow River watershed is thought to be the largest and healthiest population within the State of Wisconsin, and this population may prove crucial to survival of the species within the State. The FWS is currently conducting a range-wide status assessment of this species to determine whether it will warrant listing as an endangered or threatened species. We recommend that any future plans by the ANG regarding management or construction activities at the Hardwood Range consider the effects of those actions upon this species and measures be taken that would contribute toward conserving it. Also, if the eastern massasauga becomes federally listed or proposed for listing, the ANG should initiate section 7 consultation with the FWS if any activities proposed could affect the species.

16

If the decision is made to proceed with any of the proposals contained within the Draft EIS, the FWS will need a determination from the ANG whether the proposed activity may affect any federally listed species. That determination would form the conclusion of a biological assessment prepared by the ANG. The biological assessment should be submitted to the Field Supervisor of the FWS's Green Bay Field Office (1015 Challenger Court, Green Bay, Wisconsin 54311). When preparing a biological assessment, the following may be considered for inclusion:

17

1. Result of an on-site inspection of the area affected by the proposed activity or program. This may include a detailed survey of the area to determine if species are present and whether suitable habitat exists either for expanding the existing population or for potential reintroduction of populations.
2. The views of recognized experts on the species at issue, including those within the FWS, State conservation departments, universities and others who may have data not yet found in scientific literature.
3. A review of literature and other scientific data to determine the species' distribution, habitat needs and other biological requirements.
4. An analysis of the effects of the action on the species and habitat, including consideration of cumulative effects, and the results of any related studies.
5. An analysis of alternative actions that may provide conservation measures.

18

### Response to Comment No. 16

Because it is likely that the eastern massasauga rattlesnake will be proposed for listing prior to implementation of the proposed range expansion, coordination with USFWS, including determinations of effect for listed and proposed species, will be completed in accordance with Section 7 of the Endangered Species Act prior to implementation of the proposed action.

### Response to Comment No. 17

The ANG will consult with the FWS once a proposal has been confirmed. The coordination will be in accordance with the Endangered Species Act (ESA), as required.

### Response to Comment No. 18

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

If the biological assessment concludes that federally listed threatened or endangered species may be adversely affected, the ANG should request formal consultation with the FWS pursuant to Section 7 of the Endangered Species Act of 1973, as amended.

Section 7(d) of the 1978 Amendment to the Endangered Species Act requires that the Federal agency whose proposed action is under review shall not make any irreversible or irretrievable commitment of resources during the consultation period which in effect would preclude the formulation or implementation of reasonable alternatives to the proposed action.

#### **Fish and Wildlife Coordination Act Comments**

Under the authority of the Fish and Wildlife Coordination Act, the FWS has the responsibility of advising Federal action agencies of the potential impacts of proposed projects that affect waters of the United States, and recommending actions that can be taken to avoid, minimize, or offset adverse project impacts to fish and wildlife resources.

The Draft EIS indicates that stream and wetland alterations due to the Hardwood Range expansion are subject to individual permits under Section 404 of the Clean Water Act. The Department's comments do not preclude separate evaluation and comments by the FWS when reviewing any forthcoming permit applications. The FWS may concur, with or without stipulations, or recommend denial depending on effects. The FWS advises that it would not oppose issuance of a Section 404 permit by the U.S. Army Corps of Engineers for this project provided that the following conditions are met:

1. Demonstration of a thorough analysis of project alternatives that would avoid or minimize wetland impacts, and fish and wildlife habitat impacts; and
2. Completion of a detailed compensatory mitigation plan to offset unavoidable wetland losses that is incorporated into project plans (refer to preceding discussion of wetland mitigation); and
3. Completion of a mitigation plan to offset fish and wildlife habitat losses which would occur if the existing range is expanded.

## RESPONSES TO COMMENTS

## SUMMARY COMMENTS

The Department believes that the Draft EIS is lacking in important details regarding several aspects of the proposed actions. These inadequacies preclude an accurate assessment of project impacts on migratory birds, endangered species, wildlife habitat, and National Wildlife Refuge lands.

The Final EIS should provide additional details regarding the facilities that would be developed on the proposed expansion area, including types and amounts of wetlands and other wildlife habitat impacted, and measures to minimize or mitigate such losses. A mitigation plan should be developed in consultation with the FWS prior to issuing the Final EIS. Endangered species consultation with the FWS also should be completed prior to issuing the Final EIS if the ANG makes the determination that the proposed action may affect federally listed or proposed species.

Low-level overflights and their effects on migratory birds, endangered species, and public use of NWR lands, are other issues in need of resolution between the ANG and the FWS prior to completion of the Final EIS. The Final EIS should provide a more detailed description of impact avoidance measures which would be implemented in association with the proposed actions. The plans should specifically identify those areas which would be subject to avoidance measures, and include both spatial and temporal criteria. In addition, procedures should be developed for coordination with resource agencies to monitor compliance with these measures, and to provide for the resolution of conflicts.

The FWS has a continuing interest in working with the ANG to ensure that impacts to endangered species, fish and wildlife resources, and FWS lands and public recreational uses thereof, are adequately addressed. For continued consultation and coordination with the FWS, the ANG should contact the Field Supervisor, U.S. Fish and Wildlife Service, 1015 Challenger Court, Green Bay, Wisconsin 54311, Telephone: (920)465-7440.

Thank you for the opportunity to provide these comments.

Sincerely,

*Michael Chyzik*

for Don Henne  
Regional Environmental Officer

Enclosure

Response to Comment No. 19

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor  
George E. Meyer, Secretary

P.O. Box 7921  
101 South Webster Street  
Madison, Wisconsin 53707-7921  
TELEPHONE 608-266-2621  
FAX 608-267-3579  
TDD 608-267-6897

RESPONSES TO COMMENTS

November 20, 1997

Program Manager, Hardwood EIS  
Environmental Division  
Air National Guard CEVP  
3500 Fetchet Avenue  
Andrews AFB, MD 20762-5157

RE: Department of Natural Resources Comments on the Hardwood DEIS

Dear Project Manager:

The Department of Natural Resources has reviewed the August 1997, *Draft Environmental Impact Statement Addressing the Hardwood Range Expansion and Associated Airspace Actions*. Our comments are provided pursuant to s. 1.11, Wis. Stats., and s. NR 150.30, Wis. Adm. Code. We have included general comments relative to the entire document in the following text and page-specific comments in Attachment 1.

Our latest review indicates that you have not provided key information needed to address many of the issues we raised during the scoping process (as outlined in our letter of March 22, 1995) in preparation of the Draft Environmental Impact Statement (DEIS). This makes it impossible to adequately assess the potential environmental impacts of the proposal since the DEIS does not adequately define the nature and scope of the proposed plan.

More specifically, the DEIS does not include details (or at least reasonable approximations) on the locations and construction requirements for the various appurtenances proposed for the expansion. It is not clear what will be built, how the construction will proceed, what would be the specific locations of the work, or what environmental resources are present at those locations. The failure to provide this information makes it impossible to assess the environmental impacts. In addition, the DEIS lacks any discussion of alternative facility locations which may avoid or minimize impacts. We have been, and continue to be, concerned about impacts to wetlands, floodplains, forestry, wildlife, public recreation, and endangered resources at the specific facility locations. The DEIS descriptions of sensitive environmental areas in the various MTR's and MOA's, as well as the ANG's present and proposed measures to avoid or mitigate impacts in these areas, are too vague to allow an assessment of past compliance or future environmental impact expected. Our comments in Attachment 1 will address specific aspects of these issues.

**Response to Comment No. 1**

The ANG firmly commits to not impact wetlands in development of the proposed expansion area. Best management practices would be employed to control soil erosion (i.e., vegetated buffer zones along streams and other sensitive features, use of silt fencing around construction sites, etc.) during construction of the tactical target complex, roads, landing zone, and drop zone, so erosion should be minimal. Much of the Hardwood Range, proposed expansion area, and surrounding areas are comprised of similar wetlands that would continue to function unimpeded at the regional level.

**Response to Comment No. 2**

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).



## RESPONSES TO COMMENTS

2

### Alternatives Analysis

In addition to the lack of alternatives analysis for specific facilities, the analysis of alternatives in the DEIS is not adequate and does not expand on what was presented in the original scoping documents. In fact, the list of alternatives to be evaluated from the December 1994 DOPAA document remains exactly the same as the list in Chapter 2 of the DEIS.

According to the Council on Environmental Quality (CEQ) Regulations for NEPA, set forth in 40CFR 1500-1508, the alternatives analysis is the "heart of the environmental impact statement." A project of this complexity has many potential alternatives, and the DEIS neither fully lists the possible alternatives nor assesses those it lists. Less than 10 pages of this DEIS are devoted to the evaluation of alternatives, with most of the analysis in those pages relating to the comparison of the "no action" versus "proposed action" alternatives.

To provide a basis for decision makers and the public to assess the impact of the proposed project, the discussion of the "no action" alternative should include a concise explanation of the need for the project. From our point of view, the DEIS dwells on justifying the proposed expansion rather than providing the data and information required to assess its environmental impacts. The reasons cited (i.e., budgets, active duty reduction, weaponry advancements, improved safety, etc.) do not provide the kind of information needed by reviewers to understand the basis for the project. We assume there is an important state and national reason for the expansion, but cannot infer that from the data and discussion in the DEIS. Approximately how much money will be saved with the proposed expansion as compared to using other ranges? Are there other reasons that justify the potential impacts on the regional environment resulting from range expansion? Can some numbers be generated showing the extent of active unit downsizing, associated increased training needs for air reserve components in order to maintain an acceptable state of readiness, and the proportional role of Hardwood Range utilization and other ranges nationwide to meet such needs? Can exhibits be provided to demonstrate weaponry advancements which render the existing range obsolete/inadequate unless expanded as proposed?

As we suggested in our scoping letter of 3/22/95, the EIS should evaluate the use of combinations of alternatives to achieve project goals. For example, the DEIS did not address alternative configurations for expansion including the potential for expansion southward in Juneau County. What would be the impacts of a smaller expansion? What are the impacts associated with a combination alternative that includes: expanding use of Fort McCoy, expanding use of simulators, diverting some traffic to other ranges, etc. We do not feel that the ANG has followed the CEQ Guidelines for NEPA that calls for the agency to "...rigorously explore and objectively evaluate all reasonable alternatives...."

### Biological Survey Work

In previous correspondence with ANG staff and different consultants working on the

### Response to Comment No. 3

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 4

At this time, no DOD units have changed missions or closed down operations in a way that would alter dramatically use of any remaining air-to-ground ranges. Units will still vary their use of these remaining ranges based upon flying hours and training events required. In general, flying hours have decreased while requirements have increased to a small degree. These remaining ranges offer differing opportunities for mission accomplishment with some preferred for air-to-ground activity only and some air-to-air and air-to-ground simultaneously. Since flying hours and training requirements change, the flexibility and time/cost effectiveness of all these ranges is needed by the units.

### Response to Comment No. 5

Alternatives have been identified in Subsection 2.3 of the EIS. Expansion of the Hardwood Range to the south would render the range unflyable during portions of the year due to the proximity of Petenwell Lake and migratory bird habitat. Also, existing altitude restrictions over Necedah Wildlife Area would drastically limit realistic tactical training.

292



environmental analysis of the project, the Department provided what little information on the known locations of endangered resources in the area that was available in the Natural Heritage Inventory (NHI). In providing this information, we explicitly told ANG's consultants that, to our knowledge, the proposed expansion area, as well as the existing Hardwood Range, had not been inventoried for any taxonomic group. Thus, we had little data to provide on the potential impact area.

We did provide information on rare species and natural communities known to occur in the general vicinity of the proposed expansion (approximately 15 mile radius) as an initial way of indicating what species may occur in the impact area. The information provided was intended simply as a general guide to the types of species known to occur in the northern Juneau County/southern Wood County area. In our 3/22/95 scoping letter, it was stated that in order to satisfactorily assess the impacts to endangered resources and to evaluate measures to minimize and, if necessary, mitigate adverse effects, the following information needed to be gathered and included in the DEIS: biological composition of the proposed expansion site; biological composition of the existing range; and landscape analysis of the project's impacts on management goals of surrounding public lands. The DEIS does not present the endangered resources information or analysis requested but rather essentially repeats the information the Department provided while including only scant acknowledgment that what was provided was considered incomplete by the DNR. Although the Biological Survey (Appendix L) states that its purpose was "to determine the biological resources present on the lands considered for acquisition and existing lands used by the Wisconsin ANG", that report later concedes that only inventories for Karner blue butterfly and nesting raptors were conducted. The information consolidated from other sources on soils, hydrologic resources and vegetation types is helpful as a first step in focusing the species-specific inventories, but unfortunately, those inventories were not completed by the ANG. Without the requested inventory work and analysis, neither the ANG nor the Department is properly informed regarding the project's potential impacts to endangered resources.

#### Impacts of Replacement Lands

The DEIS lacks any analysis of the impacts associated with providing replacement lands for the Wood County Forest lands which would need to be withdrawn for the expansion. We have indicated in past correspondence and meetings with the ANG that it is our intent to require replacement lands for those withdrawn and that the impacts associated with this process are potential secondary impacts of the ANG's proposed project. We again assert that these impacts must be evaluated and disclosed in the EIS. The DEIS also does not address the issue of condemnation and the potential impacts such a course of action would have on the county forest program in Wood County.

#### Impacts of Current Range

The DEIS fails to adequately portray our concerns with the impacts of current use of the range on wildlife areas and recreation lands under airspace associated with the facility. The

#### Response to Comment No. 6

The ANG completed a Biological Survey (see Appendix L) to increase the knowledge and database regarding the area being proposed in the Hardwood Range expansion. It has contributed to the basic knowledge of the area in existence at the time, and went a long way in determining locations of habitat for the Karner Blue butterfly. This species was mentioned by several agencies as being of primary interest. Although it was not possible to obtain all of the data for the entire area due to time and cost constraints, much was gathered. Once specific areas are selected for construction or development (i.e., roads, target locations, landing strip, etc.), an in-depth survey will be conducted to determine if sensitive species will be affected. The ANG will work with the DNR and FWS on these surveys.

#### Response to Comment No. 7

As of this publication, the Air National Guard has not received any proposals that could be construed as an approach to provide alternate lands that could replace lands lost if the Department of Defense approves the range acquisition, as outlined in Section 1. If the acquisition occurs, it is anticipated that a majority of the forest lands and agricultural uses would remain as they exist today. If the Department of Defense approves the acquisition, depending on how it is accomplished (i.e., fee simple purchase, leasing from owners or the State, license, etc.), replacement lands would be an action that the State of Wisconsin or Wood County could address, as appropriate.

Land acquisition through condemnation would have similar socioeconomic effects to the acquisition of land through voluntary purchase and sale. Both would be based on the appraised value of the property and in both cases, relocation costs would be paid by the Federal government, private lands would be taken off the tax rolls once they are owned by the Federal government, and the operation and potential socioeconomic effects of the expanded range would be similar.

## RESPONSES TO COMMENTS

4

DEIS refers to sensitive areas and special mitigative measures to avoid impacts in these locations. We continue to be concerned with the lack of satisfactory enforcement of such restrictions. The DEIS states that mitigative measures will address potential impacts (such as low level flights over wildlife areas), but our experience to date indicates that similar measures currently agreed to by the ANG are not being followed or enforced.

8

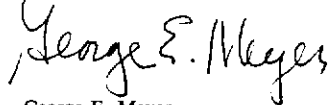
### Conclusion

The DEIS (in several locations) contains the statement: "Based upon public and agency input to date and the analyses conducted, the Proposed Action and the No-Action Alternative do not appear to result in significant environmental impacts." As outlined in the above general comments and elaborated upon in the attached specific comments, the DEIS fails to provide the information necessary to substantiate this conclusion. By addressing our comments, we expect the ANG will be in a much better position to make an appropriately informed decision on the proposed expansion.

9

Thank you for considering our comments. If you have any questions or need clarification on any of the comments, please call Dave Siebert at (608) 264-6048.

Sincerely yours,



George E. Meyer  
Secretary

Attachments (2)

cc: Adjutant General Jim Blaney- Department of Military Affairs  
Chris Spooner- Governor's Office  
Janet Smith- US Fish and Wildlife Service  
David Ullrich- US Environmental Protection Agency Region V  
Ben Wopat- US Army Corps of Engineers  
Paul Westegaard- Wood County Forestry Department  
George Aldrich- Senator Feingold's Office  
Senator Kohl's Office  
Pat Conway- Citizens Opposed to Range Expansion

### Response to Comment No. 8

If a member of the public is experiencing any problems with the military's operations in any of the airspace in the area that affects a person directly, the public affairs officer at the nearest military installation should be contacted immediately, or call (608) 245-4339.

### Response to Comment No. 9

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

294

0111LG

George

Meyer

## ATTACHMENT 1

## RESPONSES TO COMMENTS

### WDNR SPECIFIC COMMENTS ON AUGUST 1997 DEIS ADDRESSING THE HARDWOOD RANGE EXPANSION AND ASSOCIATED AIRSPACE ACTIONS

Below are the WDNR specific comments on the DEIS document. Each comment is referenced by Page/ Paragraph (or section).

#### 1. EXECUTIVE SUMMARY

Most of our comments on specific pages of the executive summary are repeated for the section of the DEIS where the point is discussed.

vi/ 5 The second sentence says, "The proposed expansion would ensure that many flights would remain over land owned or controlled by the government to further increase safety ...". Even with expansion many flights would still pass over private lands and public forest lands in which low level flights conflict with established recreation uses. The last sentence states that no live ordnance will be used at Hardwood Range. In other parts of the DEIS, there is discussion of strafing with bullets and bombs with ignitable "spotting charges". "Live ordnance" should be defined or explained. What percent of delivered ordnance currently falls outside the target area? Are there adverse effects or safety problems? ANG should provide specific factual information showing how safety would be improved with expansion?

xiii/ 2 The DEIS should justify that the costs would be excessive to relocate the range on existing federal land. The discussion on Fort McCoy says a transfer of Hardwood activity would not be likely due to current demand. This option should be looked at more closely. Also, the need for expansion of the target area is not a valid reasoning for eliminating this alternative. Likewise, the use of electronic scoring should not be eliminated on the basis of present-day technology.

xv/ 2 At least some general locational maps should be provided for the proposed construction facilities and their relationship to existing wetlands, surface waters and other sensitive environmental features. Preliminary engineering plans should be developed and included in this study. Many environmental impacts are dependent on the scope of the planned development.

xvii/ 2 (and on page 2-25) The DEIS states that noise from an aircraft at low altitude passing directly over head can have an instantaneous noise level over 100 dB. How far above 100 dB will these events be? The DEIS does not describe a reasonable worst case noise event for this project in terms of the instantaneous noise levels and the probable durations. For example if an F-16 passes overhead, what would the instantaneous noise level be? If a group of C-130s or F-16s is in a military training route at low altitude, what can a person expect in terms of instantaneous noise levels and over what duration of time? A chart showing the instantaneous dBA levels from aircraft flying at various altitudes overhead would be helpful. Another chart or another column on the chart could show the sound exposure level associated with each scenario.

xvii/ 3 Do the conclusions on risk to human hearing include the visitor area of the existing range? Under conditions of machine gun and cannon fire of overhead aircraft?

#### Response to Comment No. 10

As noted in Subsection 3.3.4.1 of the EIS, only training or inert ordnance is used on the range. No "live" (high explosive) bombs or high explosive/incendiary gun ammunition is permitted. Furthermore, as discussed in Subsection 3.3.4.1 and further explained in Subsection 4.3.2 of the EIS, before any ordnance of any type is approved for use on a target on the range, the safety footprint associated with the aircraft, the ordnance, and the delivery tactic is analyzed in conjunction with range geography. These footprints encompass sufficient area to contain 99.99 percent of the delivered ordnance at a 95 percent confidence level. If necessary, constraints may be placed on delivery profiles to ensure that the footprint remains within range boundaries.

#### Response to Comment No. 11

The alternative of using Fort McCoy was considered non-viable because the training time available for new activities at the Fort was extremely limited. This was the primary factor in eliminating Fort McCoy, along with those other items mentioned. Also, as simulated scoring becomes available, it will be utilized within the ANG and at Hardwood Range.

#### Response to Comment No. 12

See response to Comment No. 1.

#### Response to Comment No. 13

The cumulative noise levels reflected in the EIS account for all aircraft using the airspace. Also, the calculations performed by the noise model (MR\_NMAP) account for multiple aircraft passing over the same location since the cumulative noise levels represent the sum of all noise exposures experienced at each specific location. The maximum A-weighted sound levels that have been added to the document text do represent the maximum sound level experienced regardless of the number of aircraft that may be in a formation. This is because the maximum sound level is only experienced when the aircraft is closest to the receptor, and only one aircraft at a time can be in that precise location.

**RESPONSES TO COMMENTS****Response to Comment No. 14**

The risk to human hearing at the visitors area of the existing range was not specifically studied for this EIS. The conclusions that the noise levels will be below the threshold of any risk to hearing are for the MOAs and MTRs adjacent to the range's restricted area under which the public would typically experience exposure to military aircraft operations.

Range personnel at the scoring tower location work inside an enclosure. Visitors would be exposed to higher noise levels than range personnel, however, the total number of noise events would be quite small for visitors as compared to the range personnel who work at the range every day of its operation. Consequently, risk to human hearing for visitors would be proportionally smaller.

xviii/ 4 "Wood County Forest Land", should be "Wood County Forest program".

xix/ 1 See general comments concerning this conclusion statement. Neither the DNR or the Fish & Wildlife Service input lead to the DEIS's conclusions on lack of significant environmental impacts, acceptability of alternatives, or ability for adequate mitigation.

## II. SECTION 1: PURPOSE AND NEED FOR THE ACTION

1-1/ 2 What were the "aircraft limitations" that led to dropping the southern and southwestern MTR's?

1-1/ 3 The statement "The Proposed Action...includes construction of... the target locations, a landing zone and a drop zone." (emphasis added) reinforces the need for providing more specific locations of these facilities and assessing their expected impacts to specific environmental features such as wetlands.

1-1/3 There needs to be a clear definition of the term "assessed" as it pertains to the MOAs.

1-5/ 3 Relative to the obsolete equipment, what are the practices regarding leaving batteries and/or fuel and other fluids in target vehicles, target aircraft, and old fuel tank targets on the ground? All fluids should be drained and all batteries and fluids should be properly disposed.

1-7/ 1 This section states that drop zones may vary in size and purpose. Again, more specifics on what exactly is planned for this range is needed to allow an analysis of potential impacts.

1-9/ Section 1.4.5 Sensitive noise receptors need to include wildlife. Include the minimum altitude requirements and maximum flight speed for each of the sensitive noise receptors. For example, what is the minimum altitude and maximum flight speed requirement for a sensitive wildlife area for staging waterfowl? The first bullet in this section states that avoidance of sensitive areas along a MTR is "not applicable for the proposal", however we still have VR-1616 in operation in the project area.

1-13/ Section 1.5.2.3 Again, the DEIS needs to better explain the "operational limitations" that led to dropping the MTR proposals. Did public environmental concerns affect the decision as well?

## III. SECTION 2: DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

2-1/ 2 In Chapter 1 there is reference to "assessing" the MOAs based on current utilization; now the document refers to "reassessing" the utilization. A clearer discussion of the assessment or reassessment is needed.

2-1/ section 2.2 For each bullet related to airspace utilization there is mention of increasing the sorties to a figure. For each, information on the current levels should be included for comparison purposes. Same comment for sections 2.2.1.2, 2.2.1.3, and 2.2.1.4.

## RESPONSES TO COMMENTS

### Response to Comment No. 15

Comment noted. Text changed in Executive Summary.

### Response to Comment No. 16

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 17

Aircraft limitations refer to the types of training scenarios that could not be accomplished on the proposed southern and southwestern MTRs, thus significantly reducing any potential benefit from charting such airspace.

### Response to Comment No. 18

See response to Comment No. 1.

### Response to Comment No. 19

The term "assessment" is a term from the Guidelines from the Council on Environmental Quality that address how environmental documentation under the National Environmental Policy Act are to be accomplished. This EIS provides an assessment of the potential environmental impacts associated with a particular level of utilization (or sorties).

### Response to Comment No. 20

All obsolete equipment used as targets have all batteries removed and all fluids are drained. Everything is collected and disposed of through proper channels for recycling or as a hazardous waste, as applicable.

### Response to Comment No. 21

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

## RESPONSES TO COMMENTS

### **Response to Comment No. 22**

Studies conducted on wildlife have shown that numerous wildlife species have the ability to adapt to the presence of man and various man-made sound sources, including jet aircraft noise. While the noise generated from low-altitude military overflights may be initially startling, habituation to jet aircraft noise occurs with most wildlife species. Species-specific responses to low-altitude overflights vary considerably, and responses from individual animals may have the potential to cause injury. However, wildlife populations are usually affected only when a variety of factors work in combination to impact them, including declines or fluctuations in the availability of a food source, habitat destruction or alteration, predation, hunting, trapping, poaching, disease, or inclement weather, rather than noise alone. Normally it would be unrealistic to predict or attribute any wildlife population declines to a single stressor, such as noise. In addition, no published scientific evidence was identified that indicated harm may occur to wildlife as a result of exposure to the levels of noise generated by military aircraft that would utilize the airspace associated with the Hardwood Range.

VR 1616 and the Falls 1 MOA are overlapping airspace and thus the analysis has already accounted for cumulative effects.

### **Response to Comment No. 23**

Public input through the scoping process provided Air National Guard planners with the locations of potentially sensitive areas not previously identified during the DOPAA development process. In consideration of these locations (the Kickapoo Valley area as an example), operational limitation for aircraft would need to have been adopted and subsequently led to the conclusion that the viability of the airspace to provide the desired training opportunity would not be available, thus significantly reducing the potential benefit of charting new airspace in these areas.

### **Response to Comment No. 24**

The EIS is being prepared to address potential impacts based upon current and projected usage of the MOAs by military training aircraft. This may be termed a re-assessment because these MOAs have been environmentally assessed in previous environmental documents.

### **Response to Comment No. 25**

Historical use information is presented in Table 2-6.

This section does not provide an adequate description of the specific utilization of the associated airspace. For example, military aircraft frequently use flares in simulated attack exercises and use tactical maneuvering flight patterns. One such exercise occurred at 2:46 PM on September 25, 1996 over the Wildlife Refuge on the Sandhill Wildlife Area. This type of airspace use resulted in a significant impact to migratory waterfowl (Reference: September 26, 1996 Letter from Zeckmeister to Major Jeff Moore). On Thursday September 4, 1997, at approximately 9:22 AM a sonic boom occurred from military aircraft using one of the MOA's. This sonic boom was felt and heard in at least two different MOA's associated with the proposed action. These types of airspace use are not described in the proposed action nor are they addressed in Section 4 (Environmental Consequences).

26

2-7/ 1&2 As discussed above and in sections later, this discussion relative to wetland impacts is grossly inadequate. The EIS should provide specifics as to what will be built, how construction will occur, where it will occur, the wetland resources in that location, and mitigative measures to minimize impacts to those resources. Avoidance of wetlands will be difficult as the area is a mosaic of wetlands.

27

2-9/ 1 Airspace utilization would increase in Falls 1 & 2 and Volk South MOA's but not in the Volk West MOA. How is this possible when the Volk West MOA is in between the Falls 1&2 MOA's and the Hardwood Range?

28

2-12/ 2 Again, the concept of the re-assessment of the airspace needs better explanation. It seems that the no action alternative would mean that the airspace would have to go back to the previously assessed utilization levels.

29

2-15/ 1 See our general comments on the alternatives analysis. Some of the comments on this section are repeats and others are focussing on specific language in this part of the DEIS.

30

2-15/ 4&5 What does "sufficient levels to meet projected ANG use" mean? Every day of the year or just during certain period/months.

31

2-16/ 1 Reference is made here to the costs of siting a new range. Nowhere in the DEIS is there a cost comparison of the various alternatives to substantiate the conclusion that one alternative is "cost prohibitive." The new site alternative would take 10 years to get in place. How does this compare to the proposed alternative?

32

2-16/ 4 Could the ACMI be readily moved from Volk Field to other Air National Guard ranges portrayed in Figure 2-5?

33

2-18/ top Are there efforts underway to improve ACMI capability to score ordnance release skills to an acceptable level of accuracy? When might such capability be available? If available, what effect might this have on Hardwood Range and associated air space utilization needs?

34

2-18/ 1 As with other alternatives, the possibility of some combination of alternatives is never addressed (as was suggested by our 3/22/95 letter). Specifically in this section, the only alternative looked at is complete replacement of range usage with simulators.

35

2-18/ section 2.4 Refer to comments for Section 4.17. In general we are concerned that the ANG

## RESPONSES TO COMMENTS

### Response to Comment No. 26

Training scenarios associated with use of the airspace are described in detail in Appendix E to the EIS.

### Response to Comment No. 27

See response to Comment No. 1.

### Response to Comment No. 28

The Falls 1, Falls 2, and Volk South MOAs are being assessed for the number of sorties that are being flown there now and in the future. The flights are more than previous assessed values. This document will bring the assessment of the MOAs up to date. Volk West MOA has previously been assessed for more flights than are being flown today or are being predicted to be flown in the future. Therefore, there is no reason to include Volk West in the re-assessment.

### Response to Comment No. 29

See response to comment above.

### Response to Comment No. 30

Comment noted (see Section 6 in Volume I concerning incorporation of public comments).

### Response to Comment No. 31

"Sufficient levels to meet projected ANG use" includes use of Fort McCoy at times when ANG units and adequate range time are available to attain realistic training.

## RESPONSES TO COMMENTS

### **Response to Comment No. 32**

If the ANG or any other DOD component would propose a new air-to-ground or gunnery range complex, several factors including cost and time would be examined. In this case, it was determined that adequate land to support building a new range would not be a preferred solution because expansion of an existing range would be more effective in both time and money. Also, the associated infrastructure and airspace configuration to support training missions is already in existence at Hardwood Range today.

### **Response to Comment No. 33**

ACMI was installed at Volk Field primarily to support units deployed to the Combat Readiness Training Center (CRTC). Relocating the ACMI facility would deny training to currently and projected deployed units. This system relies on both the Tracking Instrumentation Subsystem (TIS) towers permanently located in the range complex and the facility located at Volk Field. Relocation would cost an estimated \$40 million. ACMI capability currently exists at Savannah CRTC, GA; Gulfport CRTC, MS; Tyndall AFB, FL; and at the large Air Force ranges in the southwest U.S. It is currently being installed at Alpena CRTC, MI. Each CRTC is centrally located to support numerous ANG and other DOD units.

### **Response to Comment No. 34**

ACMI represents constantly evolving technology. The requirement for greater accuracy has not been identified. The requirement to release actual practice ordnance at Hardwood Range is driven by training requirements. In addition to weapons release validation, actual release of ordnance provides aircrew training by validating airscoring and correction with immediate feed back from a range control officer and visual assessment of the accuracy of the bomb impact location. Increased accuracy of ACMI may reduce utilization of the Hardwood impact area slightly as simulated targets become available through the ACMI system elsewhere in the airspace complex. Overall utilization of the airspace and range will not be affected.

### **Response to Comment No. 35**

Simulators at Volk Field are already being used in combination with actual flying time using the existing Hardwood Range. Consequently, the combination of training alternatives is already built into the Proposed Action.